

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Smartmatic USA Corp., Smartmatic International
Holding B.V., and SGO Corporation Limited,

Plaintiffs

v.

Michael J. Lindell and MyPillow, Inc.

Defendants

Case No. 22-cv-0098-WMW-JFD



EXPERT REPORT OF DOUG BANIA

September 22, 2023

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I. Expert Report Information

1. I, Doug Bania of Nevium LLC (“Nevium”), have been engaged by Benesch, Friedlander, Coplan & Aronoff LLP (“Counsel”) in the case *Smartmatic et al. v. Michael J. Lindell and My Pillow, Inc.*, filed in United States District Court, District of Minnesota (the “Case”). The date of this Report is September 22, 2023 (the “Report Date”). My analysis and opinions are based on the information and documents I have received as of the Report Date, as well as my experience and training as set forth below. A numbered list of the documents I relied upon is provided in Section IV.
2. My qualifications, including a list of publications and expert testimony experience pursuant to information required by Federal Rule of Civil Procedure 26(a)(2)(B), are provided in Section V.
3. I am the founding principal of Nevium LLC. I am a Certified Licensing Professional and hold positions on the International Trademark Association’s Right of Publicity Committee and the American Bar Association’s Copyright & Social Media Committee. I have a bachelor’s degree in Cinema from San Francisco State University and a master’s degree from San Diego State University in Television, Film, and New Media Production.
4. I have over twenty years of experience analyzing and valuing intellectual properties (“IP”), intangible assets, and the businesses that use these assets. I have analyzed a range of IP, including trademarks, copyrights, and publicity rights in various contexts. My professional experience includes damages calculations for IP infringement claims, licensing, defamation, transaction advisory, and litigation support consulting. I have been named an expert in over 100 cases, deposed 32 times, and provided trial testimony 10 times.

A. The Assignment

5. For this assignment, I was asked to review the claims of defamation and deceptive trade practices brought by Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited (collectively, “Plaintiffs” or “Smartmatic”) against Michael J. Lindell and MyPillow, Inc. (collectively, “Defendants”) as stated in Plaintiffs’ First Supplemental Complaint filed April 7, 2023 (the “Complaint”).¹ Specifically, I examined how the defamation campaign

¹ Document 1a: First Supplemental Complaint

impacted the Defendants, including whether it generated additional online activity or benefits to the business or occupation of the Defendants as a result.

6. I have not been asked to provide any opinions regarding the liability of the parties in the Case. Also, I have not been asked to confirm the accuracy of any information provided to me or provide an analysis or valuation opinion of any businesses, intellectual properties, or intangible assets owned by Plaintiffs or Defendants.
7. The analysis and conclusions in this report are based upon the documents and information reviewed as of the Report Date, as well as my background in internet and social media analytic investigations. I understand that fact discovery is still ongoing. Therefore, I reserve the right to revisit this analysis and amend these conclusions and opinions should additional information and/or documents become available for review. I also reserve the right to respond to opinions and issues presented by other experts in this Case. Additionally, I reserve the right to use demonstratives and other exhibits to present the opinions expressed in this report or any supplemental, amended, or rebuttal report.
8. My rate for non-testimony-related services is \$650 an hour and \$750 an hour at deposition and trial. Nevium's support staff is billed at \$450 an hour. Nevium's compensation is not, and will not be, based on the outcome of the Case.

B. The Plaintiffs

9. Smartmatic is an election technology software company that has deployed more than 2 million devices, including voting machines and devices for voter registration and biometric verification. Since being founded in 2000, more than 30 countries have used Smartmatic election devices in over 140 elections. Smartmatic is a private company and is not owned by any government or political party.²

C. The Defendants

10. Michael Lindell is the founder and CEO of MyPillow, a Minnesota-based company that started in 2004. As of 2021, MyPillow employed 1,600 people and operated 15 retail locations.³ The

² Document 3a: Smartmatic - About Us

³ Document 3c: My Pillow Background

company has sold over 50 million pillows and other products such as bedding, mattresses, footwear, clothing, bath towels, and other related products.⁴ Lindell is also the founder of Frankspeech.com (“Frankspeech”), a broadcast network and video platform.⁵ Frankspeech offers a wide range of content, including a 24-hour livestream found at LindellTV.com (“LindellTV”), links to news articles, a podcast page, and segments produced by Frankspeech or third parties. Additionally, Lindell utilizes his website, MichaelJLindell.com, to keep his fans and customers updated about his book, documentaries, and upcoming events.⁶

D. The Case

11. In November 2020, Joe Biden and Kamala Harris won the U.S. election for President and Vice President, and Donald Trump and Michael Pence lost. The security, reliability, and accuracy of the 2020 U.S. Presidential Election were confirmed numerous times. On November 12, 2020, members of the Election Infrastructure Government Coordinating Council Executive Committee and members of the Election Infrastructure Sector Coordinating Council published a joint statement stating that “[t]he November 3rd election was the most secure in American history...[t]here is no evidence that any voting system deleted or lost votes, changed votes, or was in any way compromised.”⁷
12. Despite this, Rudolph Giuliani and Sidney Powell, as well as Fox News, Newsmax, One America News Network (“OANN”), and other broadcasting platforms spread assertions that voting election technology was manipulated in favor of Joe Biden and Kamala Harris.⁸ Lindell has supported and embellished these claims and claims he has proof that “the machines” caused the election to be stolen from President Trump.⁹ Further, Lindell asserts that Smartmatic is the “mothership” of the voter manipulation, attributing the fraud to Smartmatic’s voting machines.¹⁰ Although Smartmatic’s election technology, support, and services were only used in Los Angeles

⁴ Document 3c: My Pillow Background and Document 3b: My Pillow Homepage

⁵ Document 3e: Frankspeech Background and Document 3d: Frankspeech – About Us

⁶ Document 3f: MichaelJLindell.com – Home Page

⁷ Document 1a: First Supplemental Complaint, Paragraphs 56 through 60

⁸ Document 1a: First Supplemental Complaint, Paragraph 70

⁹ Document 1a: First Supplemental Complaint, Paragraph 158, Bullet Point (b) and Document 1v: Dawn Curtis Deposition, Page 249, Lines 10-15

¹⁰ Document 1a: First Supplemental Complaint, Paragraph 151, Bullet Points (a), (b), and (l).

County, Smartmatic became one of the voting machine companies at the center of this false and defamatory narrative due to Lindell's accusations.¹¹

13. Lindell has publicly announced that his endorsement of President Trump helped grow his profile and has attracted new customers to MyPillow. Lindell has stated that his relationship with Trump has "been very good for business..."¹² The Complaint alleges Lindell knew his election fraud claims would allow him to garner publicity, financial support, and advertising exposure for himself personally and for MyPillow.¹³ Lindell has benefited by using the exposure to advertise MyPillow products and to share MyPillow promotional codes in connection with his defamatory publications.¹⁴

E. The Claims

14. Since February 2021, Lindell has made and/or published defamatory claims about Smartmatic's history, business relationships, technology, and involvement in the 2020 U.S. election. A complete list of the "Defamatory Statements" can be found in the Complaint,¹⁵ and my analysis of these statements is summarized in Schedule 1b. According to the Complaint, the main themes related to the Defamatory Statements are:

- Smartmatic was widely used in the 2020 U.S. election to attack the election;
- Smartmatic had corrupt relationships with Dominion and Election Systems & Software ("ES&S") during the 2020 U.S. election to attack the election;
- Smartmatic stole the 2020 U.S. election in favor of Joe Biden and Kamala Harris;
- Smartmatic's technology was compromised or hacked by China or other foreign countries;

¹¹ Documents 1a: First Supplemental Complaint, Paragraphs 10 through 12 and 69. Smartmatic International and SGO did not play any direct role in the 2020 U.S. election outside of the technology, support, and services provided by Smartmatic USA for Los Angeles County.

¹² Document 1a: First Supplemental Complaint, Paragraph 55 and Document 1w: Jessica Maskovich Deposition, Page 69, Lines 8-23

¹³ Document 1a: First Supplemental Complaint, Paragraph 157

¹⁴ Document 1a: First Supplemental Complaint, Paragraph 19 and Document 1v: Dawn Curtis Deposition, Page 244, Lines 14-20

¹⁵ Document 1a: First Supplemental Complaint

- Smartmatic machines were connected to the Internet during the 2020 U.S. election to attack the election;
- Smartmatic was engaged in a criminal enterprise; and
- Smartmatic technology was designed to steal and has stolen elections before.¹⁶

15. Additionally, the Complaint states that Lindell publicly spread the Defamatory Statements through a four-pronged “Defamation Campaign” which included:

- Absolute Documentary Series: Lindell created a four-part documentary series that claimed to release “evidence” and “facts” that would corroborate the narrative that Smartmatic’s voting technology stole the 2020 U.S. election.¹⁷ The episodes are named “Absolute Proof,” “Scientific Proof,” “Absolute Interference,” and “Absolute 9-0” and were broadcast on OANN, Right Side Broadcasting Network (“RSBN”), Worldview Weekend Broadcast Network (“WVWBN”), and Lindell’s personal Facebook page. Additionally, various episodes have been posted to Frankspeech, LindellTV, MichaelJLindell.com, TheAmericanReport.org, YouTube, Rumble, Vimeo, and Facebook.¹⁸
- Media Appearances: Lindell appeared on at least 13 Internet radio and television shows to promote his documentaries, drive traffic to his website, advertise MyPillow, and spread the Defamatory Statements. Lindell continued to assert that he had “evidence” to support his claims that Smartmatic rigged the 2020 U.S. election.¹⁹ Lindell appeared on an OANN Special with Steve Bannon, OANN’s “Real America with Dan Ball,” OANN’s “Newsroom” program with Pearson Sharp, “The Pete Santilli Show,” the “Eric Metaxas Radio Show,” “Indivisible” with John Stubbins, and “USA Watchdog” with Greg Hunter. Additionally, Lindell appeared on Steve Bannon’s “War Room” podcast six times.²⁰

¹⁶ Document 1a: First Supplemental Complaint, Paragraph 129

¹⁷ Document 1a: First Supplemental Complaint, Paragraphs 80 and 84 and Document 1v: Dawn Curits Deposition, Page 136, Lines 10-20

¹⁸ Document 1a: First Supplemental Complaint, Paragraphs 85 through 87, 94, 99, and 106 and Document 1x: Todd Carter Deposition, Page 45, Lines 16-18; Page 211, Lines 6-10; Page 212, Lines 2-8 and 22-25; and 213, Lines 1-2

¹⁹ Document 1a: First Supplemental Complaint, Paragraphs 81 and 110

²⁰ Document 1a: First Supplemental Complaint, Paragraphs 111, Bullet Points (a) through (m)

- Cyber Symposium: Lindell hosted an in-person and Internet live-streamed Cyber Symposium from August 10 to 12, 2021. The purpose of the event was to prove that China helped Joe Biden steal the 2020 election using voting machine technology. During the event, Lindell claimed to have uncovered even more evidence that Smartmatic and other voting machines rigged the 2020 election.²¹ Lindell incentivized in-person attendance by offering a reward of \$5 million to anyone who could disprove the data. The Cyber Symposium was live-streamed on Rumble, RSNB, Frankspeech, and LindellTV.²²
- Post-Complaint Defamation: In January of 2023, Lindell posted a video on Frankspeech where he continued his campaign against Smartmatic while simultaneously advertising MyPillow.²³ In February of 2023, Lindell appeared on *Jimmy Kimmel Live!*, where he continued to make statements regarding his distrust of the voting machines used during the 2020 U.S. election.²⁴ In August of 2023, Lindell hosted the “Lindell Election Summit” in Springfield, Missouri, where he spoke about Smartmatic and offered a promotional code for MyPillow products.²⁵

16. The Complaint also alleges a claim under the Minnesota Deceptive Trade Practices Act, claiming the Defendants’ false and defamatory statements constitute deceptive trade practices, which disparaged Smartmatic’s goods, services, and business by false and misleading representations of fact.²⁶
17. According to the Complaint, the Plaintiffs claim that the Defendants created the Defamation Campaign against Smartmatic so they could derive substantial financial benefit through increased sales of MyPillow products.²⁷ The Plaintiffs also claim the Defendants’ Defamation Campaign caused irreparable harm to Smartmatic’s brand, reputation, and goodwill.²⁸ As a result, the

²¹ Document 1a: First Supplemental Complaint, Paragraphs 82 and 118

²² Document 1a: First Supplemental Complaint, Paragraphs 119 and 120 and Document 1x: Todd Carter Deposition, Page 214, Lines 19-22

²³ Document 1a: First Supplemental Complaint, Paragraphs 83 and 131 through 134

²⁴ Document 1a: First Supplemental Complaint, Paragraph 136

²⁵ Document 3j: Lindell Election Summit. I understand that this event is not part of the Complaint and, therefore, not part of my current investigation. If added to an amended complaint, I reserve the right to update my analyses to include this event.

²⁶ Document 1a: First Supplemental Complaint, Paragraphs 381

²⁷ Document 1a: First Supplemental Complaint, Paragraphs 383

²⁸ Document 1a: First Supplemental Complaint, Paragraphs 385

Plaintiffs are seeking economic damages, permanent injunction, punitive damages, legal fees, pre-and post-judgment interest, and any other relief the Court deems just and appropriate.²⁹

F. Investigation Period

18. For this Report, the “Investigation Period” starts on February 5, 2021, when Defendants aired Absolute Proof and began the Defamation Campaign.³⁰ The Investigation Period continues through the Report Date, as many videos, articles, and social media posts related to the Defamation Campaign are still accessible to the public.

G. Documents Considered

19. A complete list of the documents reviewed in preparation of this report is in Section IV. I also visited Frankspeech.com, LindellTV.com, michaeljlindell.com, mypillow.com, twitter.com,³¹ facebook.com, rumble.com, bitchute.com, oann.com, rsbn.com, theamerianreport.org, and others. I understand Smartmatic has requested some data in discovery, which is still outstanding. Specifically, as of the Report Date, the following information has not yet been produced by Defendants or other third parties:

- “Read and Analyze” access to Frankspeech and MyPillow’s Google Analytics and Google Ads;³²
- Viewership data related to live streams, videos, and articles of the Defamation Campaign that were posted on Frankspeech; and
- Viewership data related to live streams, videos, and articles of the Defamation Campaign that were posted on third-party platforms.

20. I reserve the right to revisit this analysis and amend the conclusions and opinions should additional information and/or documents become available for review.

²⁹ Document 1a: First Supplemental Complaint, Paragraphs 376 and 388

³⁰ Document 1a: First Supplemental Complaint, Paragraph 86

³¹ Brandwatch still refers to this social media platform as Twitter. Therefore, my report will refer to X as Twitter.

³² Document 9a and 9b. Frankspeech Google Analytics. I understand these screenshots were produced by Frankspeech as a third party in this litigation. The screenshots indicate the data has been filtered but I am unable to verify how this data was filtered without “Read and Analyze” access. Read and Analyze access is a level of permissions that allows a user to view detailed website performance data but does not allow the user to manipulate the data or make changes to the account.

II. The Impact of the Defamation Campaign

21. According to the Complaint, the Plaintiffs claim that the Defendants created the Defamation Campaign against Smartmatic with the intent of gaining publicity, financial support, and advertising exposure.³³ The Plaintiffs also claim that Defendants have benefited from the airtime by advertising MyPillow products and providing promo codes to viewers and listeners during the Defamation Campaign.³⁴ Therefore, I have analyzed:

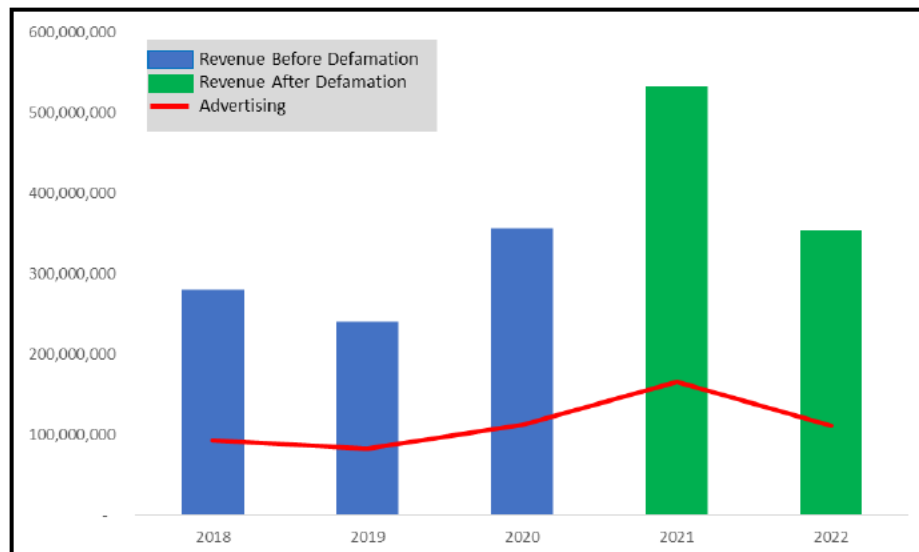
- MyPillow's profit and loss statements to determine the potential financial impact of the Defamation Campaign; and
- Alternative indications of whether the Defamation Campaign provided the Defendants with a financial benefit.

22. Details related to these analyses are provided in the following subsections.

A. MyPillow's Financial Performance

23. As of the Report Date, I have been provided MyPillow's profit and loss statements for 2018 to 2022. These financial statements are presented in Schedule 5a and summarized in Figure 1 below.

Figure 1: MyPillow Sales and Advertising Expense Performance



³³ Document 1a: First Supplemental Complaint, Paragraph 157

³⁴ Document 1a: First Supplemental Complaint, Paragraph 19

24. As presented in Figure 1, MyPillow generated sales from \$280.4 million to \$355.7 million between 2018 and 2020, or an average of \$291.9 million. During that same period, MyPillow spent between \$82.5 million and \$112.2 million annually on advertising expenses, or an average advertising-to-revenue ratio of 33.1%. MyPillow was then able to generate sales above the historical average during the period in which the Defamation Campaign was promoted and published. This is evident by MyPillow's sales of \$531.8 million in 2021 and \$354.3 million in 2022. Not only did sales increase, but the average advertising-to-revenue ratio also decreased to 31.2%, meaning the Defendants generated more sales relative to any increase in advertising spend.
25. As of the Report Date, Defendants have not publicly announced any significant changes to business operations that would explain the \$176.1 million increase in 2021 sales or the decrease in the advertising-to-sales ratio.³⁵ I understand that the Defamation Campaign started in February 2021, and related content can still be found online as of the Report Date. As presented in Schedules 2b, my Brandwatch³⁶ investigation of online publications related to the Defamation Campaign found at least 1,122 mentions where people 1) admitted they purchased MyPillow products after watching events related to the Defamation Campaign, 2) encouraged others to purchase MyPillow products, and 3) shared promotional discount codes for MyPillow products.³⁷ Examples of these mentions include:

- “I watched Absolute Proof & buying sheets, pillows, towels from Patriot Mike Lindell”
- “Wow I applaud Mike Lindell!!! I'm buying a Matteress Topper!!! He has spent millions to help us!!!”
- “MIKE LINDELL LOST \$65 MILLION because the left is canceling him for supporting President Trump. We need to STAND UP to cancel culture and show them

³⁵ Schedule 6a: Analysis of MyPillow Product Categories. A review of MyPillow's website on the Wayback Machine shows that the only new products introduced between 2020 and 2021 were related to footwear. As of the Report Date, Defendants have not provided detailed sales information to determine how much these footwear products impacted financial performance.

³⁶ Brandwatch is a social media monitoring and analytics platform that provides insights and data analysis for businesses to understand their online presence and consumer perception. Details of how my Brandwatch investigation was conducted are in Section VI and the results of my analysis are summarized in Section II.B.i.

³⁷ Schedule 5b

who's boss. PLEASE GO TO MYPILLOW.COM and use code HOPE45 for a massive discount.”

- “While you're taking in the "Cyber Symposium" make sure to take advantage of the MyPillow promo code: warroom.”
- “This man is a TRUE Patriot. Time to buy some more pillows!!!!”
- “Mike Lindell is on OAN, specifically showing the voter fraud in each state. Compelling, true and I'm going to buy me some sheets. This guy is unflappable. Check it out!”

26. Based on this information, people associated MyPillow products with the Defamation Campaign. At the same time, Defendants experienced increased revenues and decreased advertising costs.³⁸

27. Further, I analyzed how much advertising money MyPillow spent during the Defamation Campaign and compared that to an estimate of advertising money MyPillow would have spent if historical advertising-to-sales performance had been maintained. This analysis is presented in Schedule 5a and summarized in Figure 2 below.

Figure 2: Calculation of MyPillow's Advertising Savings

	2018	2019	2020	2021	2022	Cost Savings
Actual Advertising Spend						
Revenue	\$280,448,677	\$239,690,771	\$355,680,366	\$531,756,583	\$354,326,075	
Advertising to Revenue	33.2%	34.4%	31.6%	31.1%	31.3%	
Advertising Spend				165,240,559	111,056,914	\$276,297,473
Advertising Spend With Historical Ratios						
Revenue				\$531,756,583	\$354,326,075	
Advertising to Revenue: Using 3 year 2018 - 2020 Average				33.1%	33.1%	
Advertising Spend Based on Historical Performance				\$175,758,452	\$117,113,364	\$292,871,816
Advertising Spend Saved						\$16,574,343

28. As shown in Figure 2, MyPillow's average advertising-to-revenue ratio was 33.1% between 2018 and 2020 before it decreased to an average of 31.2% in the following two years. Therefore, I applied the historical 33.1% advertising-to-revenue ratio to MyPillow's 2021 and 2022 revenues. This results in advertising expenses of approximately \$292.9 million. Compared to MyPillow's

³⁸ The decrease in advertising costs is based on MyPillow's advertising-to-revenue ratio.

actual advertising spend of \$276.3 million in 2021 and 2022, the Defendants saved \$16.6 million. This is consistent with the alternative cost savings calculation mentioned in Section II.B.iii.

B. Alternative Advertising Savings Calculation

29. According to an interview on Bannon's War Room, Lindell paid for Google Ads to have his websites appear at the top of the Google search engine results page when Absolute Proof was released.³⁹ Google Ads is a platform that allows website owners to purchase keywords that trigger their Google Ads. When keywords are typed into Google search, the businesses paying for the ads appear at the top of the search engine results page, making their websites more visible and more likely to be clicked on, which increases traffic to their websites.
30. Despite Lindell's efforts, Google prevented him from using Google Ads to promote his websites. According to Google, "[c]laims that voter fraud was widespread or that the election was stolen are all prohibited by our policies. When we find content that violates our policies we remove its ability to monetize."⁴⁰ Based on these comments, it appears Google did not allow Lindell to use Google Ads to promote the Defamation Campaign, as the campaign's premise is based on voter fraud and claims that the election was stolen.
31. Lindell is aware of Google Ads and has experience in online advertising to drive traffic to his websites. As mentioned, the Plaintiffs claim the Defamation Campaign was used to advertise or drive traffic to Lindell's websites to increase sales. Alternatively, Lindell could have paid for Google Ads to drive traffic to MyPillow instead of using the Defamation Campaign to achieve exposure. Therefore, I performed a Relief from Pay-Per-Click ("RfPPC") calculation to determine how much it would have cost the Defendants to generate an equivalent amount of traffic to Lindell's websites using Google Ads that were approved by Google.
32. A RfPPC calculation was used to determine the cost of internet advertising that would have been paid had Pay-Per-Click ("PPC") advertising, i.e., Google Ads been used rather than using the Defamation Campaign to promote MyPillow products. RfPPC is an analytical technique adopted

³⁹ Document 3r: Google Ad Rumble Video – Mike Lindell is not allowed to buy his own name.
<https://rumble.com/vdqac1-mike-lindell-is-not-allowed-to-buy-his-own-name.html>

⁴⁰ Document 3s: Google Fights Election Lies – Protocol, PDF Page 3

for the growing use of Internet and social media marketing and is similar in concept to a Relief from Royalty calculation.

33. The Relief from Royalty (“RfR”) methodology calculates royalties, assuming a licensee would have licensed the Subject IP from the licensor and paid a market-based royalty. In a RfPPC calculation, advertising costs are calculated assuming the defendant would have paid a PPC fee for search traffic and click-throughs rather than use the Defamation Campaign to drive organic traffic and clicks. In both calculations, an observable market transaction is used as a proxy for the cost of the actual activity.
34. Defendants used the Defamation Campaign to achieve views and awareness for their websites and products in this case.⁴¹ Lindell could have used PPC for online advertising to drive traffic to his websites and social media accounts. However, the awareness achieved by the Defamation Campaign was achieved without paying for Internet-based advertising. Thus, the RfPPC method calculates the amount Defendants should have paid to achieve an amount of awareness and views equivalent to what was gained from the Defamation Campaign.

i) Investigation of the Defamation Campaign’s Online Activity

35. The first step in calculating the cost avoided using the RfPPC method is to identify the awareness, mentions, and views achieved by the Defamation Campaign. The Complaint alleges Lindell used the Absolute Documentary Series, Mike Lindell’s Cyber Symposium, and other media appearances to disseminate claims that Smartmatic played a role in the alleged rigging of the 2020 election. Therefore, I investigated internet and social media activity to evaluate the “reach” of the Defamation Campaign. For this Case, reach measures the size of the audience that has seen content related to the Defamation Campaign.
36. In other words, this investigation provides insight into how far the Defendants’ Defamation Campaign was disseminated and the minimum number of views the related internet and social media content received. My research focuses on determining the following:

⁴¹ Document 1a: First Supplemental Complaint, Paragraphs 17, 81, and 157

- The number of posts or “mentions” the Defamation Campaign received on third-party websites, blogs, and social media platforms (the “Internet and Social Media Investigation”); and
- The number of video views the Defamation Campaign received (the “Video Views Investigation”).

37. Videos related to the Defamation Campaign were live-streamed or published on Frankspeech, LindellTV, MichaelJLindell.com, OANN, RSBN, WVWBN, YouTube, Rumble, Vimeo, and other platforms.⁴² I also understand that Frankspeech is available on Roku, Apple TV, Google TV, and other platforms.⁴³ However, I have not received access to analytics or data indicating how many people viewed the Defamation Campaign videos on Frankspeech or any other websites and streaming platforms.
38. Additionally, efforts have been made to remove election fraud misinformation from the internet, which limits the scope of my analysis to the information provided by counsel and posts and videos still publicly available online.⁴⁴ As such, my analysis underestimates the reach of the Defamation Campaign.

a. Internet and Social Media Investigation

39. My Internet and Social Media Investigation used Brandwatch to determine how many mentions the Defamation Campaign received on third-party websites, blogs, and social media platforms. Brandwatch is a social media monitoring and analytics platform that provides insights and data analysis for businesses to understand their online presence and consumer perception. Brandwatch provides data on 100 million online sources and 1.4 trillion posts.⁴⁵ A detailed explanation of the steps required to create the dataset for my analysis is presented in Section VI and summarized below.
40. To discover relevant websites, blogs, and social media posts, I created a “query” within Brandwatch to search the database for mentions related to the Defamation Campaign. A query is

⁴² Document 1a: First Supplemental Complaint, Paragraphs 85 through 87

⁴³ Document 3k: Connect Your Device - Frankspeech

⁴⁴ Document 3l: YouTube – An Update on Our Approach to US Election Misinformation and Document 3m: Facebook Bans Stop The Steal Content

⁴⁵ Document 3g: Brandwatch – Consumer Research

a search string of keywords, terms, and Boolean operators⁴⁶ that help filter the database to find the most relevant mentions.⁴⁷ The query I developed includes keywords and phrases related to:

- Smartmatic, Mike Lindell, MyPillow, MyPillow Guy;
- Platforms and programs related to Mike Lindell, such as Frankspeech, LindellTV, MichaelJLindell.com, the Cyber Symposium, and the Absolute Documentary;
- News programs and podcasts, such as OANN, War Room, The Pete Santilli Show, Eric Metaxas Radio Show, USA Watchdog, and others;
- News hosts, such as Eric Metaxas, Steve Bannon, Greg Hunter, and others;
- Social media sites, such as Twitter, Facebook, Rumble, BitChute, and others;
- Social media handles, such as @realMikeLindell; and
- Social media hashtags, such as #MikeLindell and #Smartmatic.

41. This query resulted in approximately 28.5 million mentions by 3.4 million unique authors during the Investigation Period.⁴⁸ Many of these mentions are unrelated to the Defamation Campaign or this Case. Therefore, I added “categories”⁴⁹ to the query to filter out irrelevant mentions and to group the data by the events that form the Defamation Campaign. For example, the dataset is now filtered and grouped by mentions related to Absolute Proof, Absolute Interference, Absolute 9-0, Scientific Proof, Mike Lindell’s Cyber Symposium, Mike Lindell’s appearance on USA Watchdog, Steve Bannon’s War Room, and other related events.⁵⁰ I also added a date range filter to only include mentions published in close proximity to each event. Adding these segments results in 151,532 total mentions by at least 93,193 unique authors.⁵¹

⁴⁶ Document 3h: How to Write a Good Query. Boolean operators are simple words or symbols that give a computer some criteria to use when searching. Words such as AND, NOT, and OR are all Boolean operators.

⁴⁷ Document 3h: Brandwatch – How to Write a Good Query

⁴⁸ Document 7a: Brandwatch Overview – Query Results. The mention summaries listed on Brandwatch are an estimate of relevant mentions based on the criteria found in the query.

⁴⁹ Document 3n: Brandwatch Categories. Categories provide a structured way to segment data based on selected criteria, allowing the data to be specific to a desired topic or theme. This allows a user to analyze the categorized data separately from the whole dataset.

⁵⁰ Document 7c: Brandwatch Categories

⁵¹ Schedule 2a: Summary of the Internet and Social Media Investigation

42. Further, the data was extracted into Excel and manually analyzed to ensure all the mentions were related to the Defamation Campaign. To determine if the mentions are relevant, I used two different methodologies.

- I utilized Excel formulas to determine if the “Title,” “Snippet,”⁵² “URL,” or “Expanded URL” of each mention contained relevant keywords related to the Defamation Campaign. This methodology was applied to the Cyber Symposium, Absolute Proof, Absolute Interference, and Absolute 9-0 datasets as they contain thousands of mentions that are generally associated with the Defamation Campaign.⁵³
- I manually reviewed all mentions related to Media Mentions, Scientific Proof, and the Jimmy Kimmel Show. These datasets were manually reviewed as they contain mentions that are not relevant to the Defamation Campaign.⁵⁴ For example, the “Scientific Proof” dataset contained mentions of the Defamation Campaign but also contained mentions related to religion, the coronavirus disease, the 9/11 terrorist attacks, and various science-related topics.

43. The analysis results are presented in Schedule 2a and summarized in Figure 3 below.

Figure 3: Internet and Social Media Mentions of the Defamation Campaign⁵⁵

	Cyber Symposium	Absolute Series	Media Mentions	Other	Total
Twitter	59,245	40,872	2,982	646	103,745
News	2,449	1,048	577	0	4,074
Forum	2,242	1,388	209	0	3,839
Blog	1,763	1,016	145	0	2,924
Reddit	486	144	8	0	638
Tumblr	449	260	30	0	739
YouTube	369	201	1	0	571
Review	2	4	0	0	6
Total Relevant Mentions	67,005	44,933	3,952	646	116,536
Unique Authors	36,321	31,807	3,168	576	71,872

⁵² Document 3o: Brandwatch Snippet Definition. A Snippet is part of the mention text that best matches the query. For example, an article may mention various parts of a story, but the Snippet will only show the part of the story that is relevant to the query.

⁵³ Documents 8a to 8d: Mention Data – Datasets analyzed with Excel formulas

⁵⁴ Documents 8e to 8n: Mention Data – Datasets analyzed manually

⁵⁵ “Other” category includes Jimmy Kimmel Live appearance and Smartmatic Lawsuit.

44. As seen in Figure 3, the Defamation Campaign and related comments are spread through at least 103,745 Tweets, 4,074 news sources, 3,839 forums, 2,924 blogs, 739 Tumblr posts, 638 Reddit posts, 571 YouTube pages, and 6 review pages. In other words, the Defamation Campaign and related comments are mentioned across these sources at least 116,536 times by 71,872 unique authors.⁵⁶
45. The Internet and Social Media Investigation identifies the platform where mentions related to the Defamation Campaign are posted and who posted them, but it does not indicate total reach. The reach of the Defamation Campaign is much greater than these results, as multiple people typically read a post, watch a video, or listen to a podcast. In other words, this analysis only accounts for the number of posts published, not the number of views, likes, comments, or other interactions the post achieved. Additionally, reach is typically higher than likes, shares, or comments, as not every person exposed to a publication or video interacts with that post.
46. As mentioned, I have not been provided with analytics that show how many people viewed all the publications, videos, or live streams related to the Defamation Campaign. The primary viewership information found in my Internet and Social Media Investigation was video views. Therefore, I relied on publicly available video view information to determine reach, as this provided the best indication of how many people were interested in or viewed the events related to the Defamation Campaign. My analysis related to video views is detailed in the next section.

b. Video Views Investigation

47. For my Video Views Investigation, I found videos related to the Defamation Campaign through the Internet and Social Media Investigation and various Internet searches using keywords related to these events. Videos related to the Defamation Campaign are posted on multiple third-party websites such as Rumble, BitChute, YouTube, Facebook, and many others.⁵⁷ My analysis is limited to Rumble, BitChute, YouTube, and Facebook, as other websites that contain videos

⁵⁶ Schedule 2a: Summary of Internet and Social Media Investigation. Mentions are higher than unique authors as an author can post more than one mention. Also, an additional 2,310 relevant mentions do not indicate who the author was. Therefore, the 71,872 unique authors mentioned in this Report are an underestimate of the number of people who have posted information, comments, or opinions in relation to the Defamation Campaign.

⁵⁷ Schedules 3b to 3d: Absolute Documentary Series, Cyber Symposium, and Media Appearance Video Investigation

related to the Defamation Campaign do not publicly display viewership data. Additionally, I only considered videos mentioning Smartmatic or “the machines.”⁵⁸

48. The videos related to the Defamation Campaign are also found on Frankspeech. I received Google Analytics screenshots related to 250 Frankspeech links that contain full videos, video clips, or search results related to the Cyber Symposium and Absolute Documentary Series.⁵⁹ Again, my analysis only considered the links that contain videos mentioning Smartmatic or “the machines.” I also considered unique pageviews to be equivalent to video views as the videos found on these web pages automatically start when the web page is loaded.⁶⁰
49. As presented in Schedule 3a, a review of Rumble, BitChute, YouTube, Facebook, and Frankspeech determined that at least 129 videos are related to the Defamation Campaign and are posted on at least 88 individual channels or programs, including Bannon’s War Room, The Charlie Kirk Show, The Pete Santilli Show, OANN, RSBN, The Eric Metaxas Radio Show, and various other public accounts. Based on this investigation, the videos related to the Defamatory Statements have been viewed over 21.8 million times.
50. Therefore, not only have mentions related to the Defamation Campaign been spread through thousands of people on various internet platforms, but video content related to this campaign has been viewed at least 21.8 million times. As mentioned, my analysis underestimates the reach of the Defamation Campaign as it does not consider live stream views, podcast listenership, the number of people who read related articles, views from videos that have been removed from the Internet, and video views from websites that do not publicly provide the viewership data.

ii) Pay-Per-Click Price

51. The second step in calculating the cost avoided using the RfPPC method is to identify the PPC cost Defendants have historically paid for online advertising. For this, I relied on the Google Keyword Planner, a marketing tool that provides insight into what keywords are searched in

⁵⁸ Several video clips related to the Defamation Campaign do not mention Smartmatic or the machines. Although Defendants have pulled Smartmatic into the “election fraud” theory, I did not include these videos. Therefore, my Video Investigation is conservative and understates the number of views the Defamation Campaign received.

⁵⁹ Schedule 3e: Frankspeech Video Investigation

⁶⁰ Document 3p: Google Analytics Help – Definitions. In other words, a unique pageview is counted when a web page is loaded. A view is typically counted when the video starts playing. Since videos on Frankspeech start when the web page is loaded, I consider these metrics to be similar, if not the same.

Google, the average month searches, and the PPC price to use keywords in Google Ads. The Google Keyword Planner provides historical PPC price data within the Investigation Period.

52. As presented in Schedule 4a, I searched Google Keyword Planner to determine the cost for terms related to Lindell and his websites. The keywords I searched for this investigation were all variations of Frankspeech, MyPillow, and LindellTV, as each website provides promo codes or links back to MyPillow. I also searched for variations of Mike Lindell, as he is associated with each of the mentioned websites and referred to as Mike Lindell, Michael Lindell, and the MyPillow Guy.⁶¹ Nine searched terms have a PPC price, meaning people have used these keywords in Google Ads. Based on this investigation, the Google Keyword Planner shows that the weighted average PPC price for variations of the terms Frankspeech, MyPillow, LindellTV, and Mike Lindell is \$0.75. In other words, a website owner using a combination of these nine terms in Google Ads can expect to pay approximately \$0.75 every time a person clicks on an associated ad.

iii) RfPPC Calculation

53. The third and final step is to apply the PPC price to the number of video views related to the Defamation Campaign to calculate the marketing cost avoided by Lindell and MyPillow. Based on a reach of 21.8 million video views and a PPC price of \$0.75, Defendants should have paid at least \$16.3 million through online advertising to achieve an amount of awareness and views equivalent to what was achieved from the Defamation Campaign.⁶²
54. As a result, my review of MyPillow's financial statements and the RfPPC calculation generated similar results in the \$16 million range. In other words, the Defamation Campaign allowed the Defendants to save between \$16.3 million and \$16.6 Million in advertising costs.

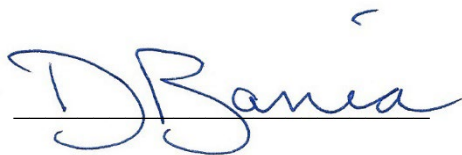
⁶¹ The search included frankspeech.com, frankspeech, frank speech, mypillow.com, mypillow, my pillow, lindelltv.com, lindelltv, lindell tv, mike lindell, mypillow guy, my pillow guy, and michael lindell.

⁶² Schedule 4a: Pay-Per-Click Calculation

III. Conclusion

55. After reviewing the documentation listed at Section IV and performing an investigation and analysis supported by my experience in financial analysis and internet and social media investigations, I arrived at the following conclusions in this Case:
- The Defamation Campaign received at least 116,536 mentions by 71,872 unique authors, and at least 1,122 of the mentions showed people 1) admitted they purchased MyPillow products after watching events related to the Defamation Campaign, 2) encouraged others to purchase MyPillow products, and 3) shared promotional discount codes for MyPillow products.
 - Videos related to the Defamation Campaign received at least 21.8 million views.
 - Defendants saved between \$16.3 million and \$16.6 million in online advertising expenses using the Defamation Campaign.
56. My opinions in this Case are based upon the documents and information reviewed as of the Report Date as well as my expertise in social media and internet analytic investigations. Should additional information and/or documents become available for review, I reserve the right to update this analysis, and if necessary, update any opinions offered here.
57. Further, I reserve the right to respond to opinions and issues raised by any opposing experts. Finally, I reserve the right to use demonstratives and other exhibits to present the opinions expressed in this report and/or any supplemental, amended, and/or rebuttal reports.

Submitted by:



IV. Documents Relied Upon

DOC #	Document Title
1a	First Supplemental Complaint
1b	Exhibit 1 to First Supplemental Complaint
1c	Exhibit 9 to First Supplemental Complaint
1d	Exhibit 11 to First Supplemental Complaint
1e	Exhibit 12 to First Supplemental Complaint
1f	Exhibit 14 to First Supplemental Complaint
1g	Exhibit 16 to First Supplemental Complaint
1h	Exhibit 18 to First Supplemental Complaint
1i	Exhibit 20 to First Supplemental Complaint
1j	Exhibit 22 to First Supplemental Complaint
1k	Exhibit 3 to First Supplemental Complaint
1l	Exhibit 24 to First Supplemental Complaint
1m	Exhibit 26 to First Supplemental Complaint
1n	Exhibit 5 to First Supplemental Complaint
1o	Exhibit 108 to First Supplemental Complaint
1p	Exhibit 28 to First Supplemental Complaint
1q	Exhibit 30 to First Supplemental Complaint
1r	Exhibit 7 to First Supplemental Complaint
1s	Exhibit 32 to First Supplemental Complaint
1t	Exhibit 143 to First Supplemental Complaint
1u	Exhibit 145 to First Supplemental Complaint
1v	Dawn Curtis Deposition
1w	Jessica Maskovich Deposition
1x	Todd Carter Deposition
2a	Mike Lindell - Google Keyword Planner
2b	LindellTV - Google Keyword Planner
2c	Frankspeech - Google Keyword Planner
2d	MyPillow - Google Keyword Planner
3a	Smartmatic-About Us
3b	My Pillow Homepage
3c	My Pillow Background
3d	Frankspeech - About Us
3e	Frankspeech Background
3f	MichaelJLindell.com - Home Page
3g	Brandwatch - Consumer Research
3i	Brandwatch - Magpie Crawler
3h	Brandwatch - How to Write a Good Query
3j	Lindell Election Summit
3k	Connect Your Device - Frankspeech

DOC #	Document Title
3l	YouTube - An update on our approach to US election misinformation
3m	Facebook bans 'stop the steal' content, 69 days after the election _ CNN Business
3n	Brandwatch - Categories
3o	Brandwatch - Snippet Definitions
3p	Google Analytics Help - Definitions
3q	Query Operators – Consumer Research
3r	Google Ad Rumble Video - Mike Lindell is not allowed to buy his own name
3s	Google fights election lies, but pro-Trump ads funds it - Protocol
4a - 4ab	Cyber Symposium Video Views
5a - 5bw	Absolute Documentary Series Videos
6a - 6r	Media Appearance Videos
7a	Brandwatch Query Results
7b	Brandwatch Updates Video Results
7c	Brandwatch Categories
8a	Cyber Symposium Mention Data
8b	Absolute Proof Mention Data
8c	Absolute Interference Mention Data
8d	Absolute 9-0 Mention Data
8e	Scientific Proof Mention Data
8f	OANN Special Mention Data
8g	War Room Podcast Mention Data
8h	Eric Metaxas Radio Show Mention Data
8i	OANN Newsroom Mention Data
8j	Real America with Dan Ball Mention Data
8k	USA Watchdog Mention Data
8l	Pete Santilli Show Mention Data
8m	Indivisible with John Stubbins Mention Data
8n	Jimmy Kimmel Mention Data
9a	Frankspeech Google Analytics - Absolute Documentary Series FS000001-000004
9b	Frankspeech Google Analytics - Cyber Symposium FS000005-000054
10a	2018 MyPillow P and L
10b	2019 MyPillow P and L
10c	2020 MyPillow P and L
10d	2021 MyPillow P and L
10e	2022 MyPillow P and L
11a – 11m	MyPillow – Wayback Machine 2020 and 2021

V. Doug Bania CV

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Winston Smith v. Chapter 4 Corp., “Supreme”; Blackrock Creative Management Company and DEAD KENNEDYS; USDC Central District of California, Case No. 2:16-cv-03910-GW-AS. **Copyright Apportionment Damages**, Expert Report & Deposition, 2017.

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Uncommon, LLC v. Spigen, Inc.; USDC Northern District of Illinois Eastern Division, Case No. 15-cv-10897. **Trademark Damages, Website Analysis**, Expert Report & deposition, 2016

The Julia Child Foundation for Gastronomy and the Culinary Arts v. Airbnb, Inc., Superior Court of the State of California for the County of Santa Barbara, Case No. 16CV02626. **Right of Publicity & SEO Analysis**, Expert Report & Mediation Testimony, 2016

Pines International, Inc. v. Suja Life, LLC, USDC Southern District of California, Case No. 3:16-cv-00985-GPC-WVG. **Trademark Damages**, Settlement Brief Testimony, 2016

Unicolors, Inc. v. Kohl’s Department Stores, Inc.; Fashion Life Inc.; Jes Apparel, L.L.C., USDC Central District of California, Case No. 2:16-cv-00393-RGK-SS. **Copyright Damages**, Expert Report, 2016

Timed Out, Inc. v. Crazy Horse, Inc

., Superior Court of the State of California, County of San Francisco – Civic Center Courthouse, Case No. CGC-15-547904. **Right of Publicity & SEO Analysis**, Expert Report, 2016

Adobe Systems Incorporated v. A&S Electronics, Inc., dba Trustprice; Alan Z. Lin; et. al., USDC Northern District of California Oakland Courthouse, Case No. 4:15-cv-02288-SBA. **Trademark & Copyright Damages**, Expert Report, 2016

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Nina Pham v. Texas Health Resources, Inc., District Court of Dallas County, Texas 68th Judicial District, Cause No. DC-15-02252. **Right of Publicity Damages & SEO Analysis**, Expert Report & Deposition, 2016

Christopher Gordon v. Drape Creative, Inc.; Papyrus-Recycled Greetings, Inc. USDC Central District of California, Case No. CV 15-04905 JFW (PLAx). **Trademark Damages**, Expert Report, 2016

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Mark Spitz v. New Vitality LLC, NAC Marketing Company, Superior Court of California County of Los Angeles, Case No. SC121977. **Right of Publicity Damages & SEO Analysis**, Expert Consulting, 2016

Global Tobacco, LLC v. R.K. Co., dba Cigar Cartel, USDC Central District of California Western Division, Case No. 2:15-CV-05227. **Trade Dress Damages**, Expert Report, 2016

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Reese Witherspoon v. Sears Holdings Management and Sears Brands LLC, et al., Case No. SC120883, Superior Court of the State of California, County of Los Angeles, West District. **Right of Publicity Damages & SEO Analysis**, Expert Report, 2016

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Cynara Busch v. Jakov Dulcich and Sons, LLC, Sunlight International Sales, Inc., Case No. CIV 1404125, Superior Court of the State of California, County of Marin, **Right of Publicity Damages**, Expert Consulting, 2015

Markwins Beauty Products, Inc. v. Krystal Ball Productions, Inc. and Fergie Duhamel, Arbitration, Pasadena, CA. **Right of Publicity Damages**, Expert Report, 2015

Stone Creek, Inc. v. Omnia Italian Design, Inc., Case No. CV-13-00688-PHX-DLR, USDC, District of Arizona, **Trademark Damages & SEO Analysis**, Expert Report, Deposition and Trial Testimony, 2015

Unicolors, Inc. v. Urban Outfitters, Inc., dba Free People; Century 21 Department Stores, LLC, Case No. CV14-1029 SJO (VBK) USDC, Central District of California, **Copyright Damages**, Expert Report and Trial Testimony, 2015

Matthew C. Morin v. Cindy Marabito, Case No. RG14747850, California Superior Court, Alameda County. **Defamation Damages**, Expert Consulting, 2015

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Scott Ehredt v. Medieval Knights, LLC, Case No. BC530275, Superior Court for the State of California, County of Los Angeles, **Right of Publicity Damages**, Expert Report, 2015

Radix Textile, Inc. v. Anthropologie, Inc., Case No. CV14-04272-BRO (EX), USDC, Central District of California, **Copyright Damages**, Expert Report, 2015

Unicolors, Inc. v. Urban Outfitters, Inc., dba, Free People, Case No. 2:14-cv-03217-R-AGR, USDC, Central District of California, **Copyright Damages**, Expert Report, 2014

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Jason Olive v. General Nutrition Centers, Inc., Case No. BC482686, Superior Court for the State of California, County of Los Angeles. **Right of Publicity Damages**; Expert Consulting, 2014

Amini Innovation Corporation v. McFerran Home Furnishings, Inc., Case No. CV13-06496-RSWL(SSx), USDC, Central District of California. **Trade Dress and Copyright Damages**, Expert Report, 2014

One Beacon Insurance Company v. National Casualty Company, Case No. CV 06342-550-JC, USDC, Central District of California. **Copyright Damages**; Expert Opinion, 2014

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Cengage Learning, Inc., et al., United States Bankruptcy Court Eastern District of New York. Copyright Damages; Expert Opinion and Rebuttal Opinion regarding **valuation of higher education textbook copyrights** on behalf of the Second Lien Indenture Trustee in Chapter 11 bankruptcy cases, 2014

The Julia Child Foundation for Gastronomy and the Culinary Arts v. **DGWB Advertising and Communications**, Case No. 8:12-CV-1402SJO, USDC, Central District of California. **Right of Publicity Damages & SEO Analysis**; Expert Report and Deposition, 2013

United Fabrics International, Inc. v. **G-III Apparel Group, LTD; dba Wilsons Leather; Mcklein Company, LLC**, USDC, Central District of California. **Copyright Damages**; Expert Report, 2013

David Wolfe, v. **Sunfood, LLC**, et al.; Case No. 37-2011-00066729-CU-CO-CTL, Superior Court of the State of California for the County of San Diego. **Right of Publicity Damages**; Deposition, 2013

Brady Industries, LLC v. Waxie's Enterprises, Inc., 2:12-cv-00777-PMP-VCF, USDC, District of Nevada. **Copyright Damages and SEO Analysis**; Expert Report and Deposition, 2013

Rawlings Sporting Goods Company, Inc., v. Wilson Sporting Goods, 4:12-cv-01204-01204, USDC, Eastern District of Missouri. **Trademark Damages**; Expert Opinion, 2013

Rebel Media, No Good Entertainment v. **Jay Vir, No Good Digital**; CV12-04602-R-JC, USDC, Central District of California, Western Division. **Trademark Damages & YouTube SEO Analysis Investigation**; Expert Opinion, 2013

Marona Photography, Inc. v. **Los Altos Boots, Wild West Boots**. 12-CV-00163-WYD-MJW, USDC, District of Colorado. **Copyright Damages**; Expert Report, 2012

Ricky D. Ross v. **William Leonard Roberts, II**; CV10-4528-PA (RZx), The USDC, Central District of California, Western Division – Los Angeles. **Right of Publicity Damages**; Rebuttal Opinion, 2012

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John Frederick Dryer, et al. v. National Football League; 0:09-cv-02182-PAM-AJB, USDC, District of Minnesota. **Right of Publicity Damages**; Expert Opinion, 2009

Education & Certifications

Certified Licensing Professional (CLP); 2011

San Diego State University; Masters, Television, Film, New Media Production; 2000

San Francisco State University; Bachelor of Arts, Cinema; 1997

Employment Experience

Nevium Intellectual Property Consultants; San Diego, CA; 2012 – present
Founding Principal: Provide IP strategy, licensing, valuation and expert services

CONSOR Intellectual Asset Management; La Jolla, CA; 2002 – 2012
Principal: Managed client & firm relations and provided expert witness services

Independent Film Producer; Los Angeles, CA; 2000 – 2003
Producer for two award winning short films: Boundaries and Passing Through.

Associations & Memberships

Licensing Executives Society (LES)

International Trademark Association (INTA)

INTA Right of Publicity Committee (2020 - 2023 terms)

INTA Internet Committee (2016 - 2019 terms)

Member, Copyright Society of the United States

ICANN Compliance and Domain Name Industry Subcommittee (2016 - 2019 terms)

American Bar Association (ABA), Section of Intellectual Property Law

American Bar Association (ABA), Copyright & Social Media Committee

Copyright Society, Website & Social Media Committee

Publications & Presentations

“Profit Apportionment in Intellectual Property Infringement Damages Calculations” Intellectual Property Valuation Case Law Compendium, Fourth Edition. Business Valuation Resources (BVR), 2022

“Tools of the Trade: Trends and Developments in IP Valuation and Dealmaking Data and Internet Tools.” Panel presentation at the LES 2022 Annual Meeting, 2022

“Using Internet and Social Media Analytic Tools for Valuation and Damages Calculations” Presentation at the NACVA Business Valuation & Financial Litigation Hybrid & Virtual Super Conference, 2022

“Introduction to Copyright Valuation” Chapter 3 in the Practical Guide to Successful Intellectual Property Valuation and Transactions by Kluwer Law International, 2022

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“Can Trademark Infringement Be a Victimless Crime?” Table Topic for the International Trademark Association (INTA), 2021

“Defamation Investigations: A Big Leap in Fighting Back” published in The Intellectual Property Strategist, 2021

“Proving Online Defamation: No Longer a Black Box” published in Law.com: Legaltech News, 2021

“Valuing Brands in the Tech Sector Using an Apportionment Framework” published in the National Association of Certified Valuators and Analysts (NACVA) The Value Examiner, 2021

“Using Internet Analytic Tools for Valuation and Damages Calculations in Internet IP Infringement and Defamation Cases” published as a chapter in The Comprehensive Guide to Economic Damages book by Business Valuation Resources (BVR), 2021

“Profit Apportionment in Intellectual Property Infringement Damages Calculations” published as a chapter in The Comprehensive Guide to Economic Damages book by Business Valuation Resources (BVR), 2021

“Trademark and Brand Valuation” webinar for the Confederation of Indian Industry (CII), 2021

“What to Look for When Valuing a Cannabis Business” Cannabis Business Times, 2019

“Internet Tools for Intellectual Property Analysis” presented as a webinar for the Certified Patent Valuation Analyst certification, 2019

“Investigating Online IP Infringement and Calculating Damages for Internet Related Disputes” presented at the University of San Diego School of Law, 2019

“Nevium: Influencer Marketing Meets Intellectual Property” Forbes, 2019

“Calculating the Value of Influencer Marketing and Impact of Infringement” Attorney at Law Magazine, 2019

“Building Cannabis IP Includes Both Your Brand and Your Technology” Entrepreneur, 2019

“Can Trademark Infringement Be a Victimless Crime? The Stone Creek v. Omnia Case” International Journal of Law and Public Administration, Redfame Publishing Inc., 2018

“Apportionment Models: Valuing the Contribution of Intangible Property and Assets in Disputes” A Special Series Webinar on New Economic Damages Guide. Business Valuation Resources (BVR), 2018

“Using Internet Analytic Tools for Valuation and Damages Calculations in Internet IP Infringement and Defamation Cases” published as a chapter in The Comprehensive Guide to Economic Damages book by Business Valuation Resources (BVR), 2018

“Profit Apportionment in Intellectual Property Infringement Damages Calculations” published as a chapter in The Comprehensive Guide to Economic Damages book by Business Valuation Resources (BVR), 2018

The Florida Bar Business Law Section, 9th Annual Intellectual Property Symposium. Panel on the Blurred Lines trial – Speaking as the copyright damages and apportionment expert. St. Pete Beach, FL, April 2018

“Proving Infringement in Online Trademark Disputes” Luncheon Table Topic at the 140th Annual International Trademark Association (INTA) Meeting, Seattle, WA May 2018

“Building Brands and Maximizing Value” Workshop Session presented at the Licensing Executive Society (LES) 2017 Spring Meeting entitled Stronger Economies Through Licensing, Washington, DC, May 2017

“Blurred Lines – Music Industry Damage Calculations” Panel Session presented at SXSW, Austin, TX, March 2017

“Non-Traditional Marks and the Traditional Practice” Luncheon Table Topic for the International Trademark Association (INTA), San Diego, CA, February 2017

The Use of Analytic Tools for Valuation and Damages Calculations in Internet IP Infringement and Defamation Cases” published as a chapter in Calculating Economic Damages in Intellectual Property Infringement Cases book by Business Valuation Resources (BVR), October 2016

“Misuses of IP Over the Internet: Searching for Value.” Business Valuation Resources (BVR) Special Series Webinar: The Comprehensive Guide to Economic Damages, July 2016

“The Use of Analytic Tools for Valuation and Damages Calculations in Internet IP Infringement and Defamation Cases” published as a chapter in The Comprehensive Guide to Lost Profits and Other Commercial Damages book by Business Valuation Resources (BVR), May 2016

“Brand Valuation and Techniques” presented at the Conference on Brand Valuation; University of New Hampshire School of Law and The Franklin Pierce Center for Intellectual Property. Concord, New Hampshire, April 2016

“Valuation and Damages Calculations in Cases Involving Internet IP Infringement and Defamation.” NACVA Webinar Series, April 2016

“Brand Due Diligence: Tools and Techniques for Supporting Successful Brand Driven Transactions” Luncheon Table Topic at the International Trademark Association (INTA) Annual Meeting, Orlando, FL, May 2016

“Employing Internet and Social Media Analytical Tools in Valuation and Damages Calculations” Featured Presenter at the NACVA and the CTI’s 2016 Annual Conference. San Diego, CA, June 2016

“Apportioning Copyright Damages: The Case of Blurred Lines” published in the Journal of Intellectual Property Law and Practice, Vol. 10, No. 12, November 2015

“Intellectual Property Valuation: Methodologies and Case Studies” presented at the American Society of Appraisers (ASA), San Diego Chapter monthly meeting, San Diego, 2015

“Blurred Lines or Fuzzy Math: How Did They Come Up with \$7.3 Million or was it \$5.3 Million? – Damage Calculations in the Music Industry, New York State Bar – Entertainment Business Law Seminar in Association with CMJ Music Marathon, New York, 2015

“Internet Analytic Tools for Brand Valuation, Damages and Defamation” Luncheon Table Topic at the International Trademark Association (INTA) 2015 Annual Meeting, San Diego, CA

“Valuation and Damages Calculations in Cases Involving Internet IP Infringement and Defamation” presented at the NACVA and the CTI’s 2015 Annual Conference, June 2015

“How to Calculate Damages for Internet and Social Media Infringement” presented at the 36th Annual BAA/PMA Marketing Law Conference, 2014

“Calculating Damages from Internet IP Infringement and Defamation” presented at the Internet Law Leadership Summit, 2014

“Estimating and Managing the Economic Impact of Brand Disparagement” published in the World Trademark Review, 2014

“SFIA Legal Task Force Series: Intellectual Property Litigation & Valuation” presented to the Sports & Fitness Industry Association members, 2013

“Copyright Valuation and Damages: Different Tools for Different Challenges” presented to The State Bar of California, Intellectual Property Law Section, 2013

“Key Concepts in Intellectual Property Valuation” presented to various law firms, 2012

"Intellectual Property Valuation," presented to various law firms, 2011

“Valuing Your Brand for Sale or Securitization”, presented to LIMA members, 2011

“Valuing the Intangible: Where to Start? The Full Family of Intellectual Property and Other Intangibles,” CLE presented to various law firms, 2010

“Valuation, Licensing, Damages and Expert Witnesses,” CLE presented to various law firms, 2009

“Brand Leverage and Valuation” presented to various corporations, 2008

“Deceptive Product Endorsement: Unauthorized Use of a Celebrity’s Name and Likeness,” published in Total Licensing Magazine, 2006

VI. Exhibit A: Brandwatch Analysis Description

1. As discussed above in Section II, the Internet and Social Media Investigation relies on a dataset made up of social media posts, news sites, blogs, forums, and review pages found in Brandwatch's database. Brandwatch is a social media monitoring and analytics platform that provides insights and data analysis for businesses to understand their online presence and consumer perceptions. Brandwatch provides data on 100 million online sources and 1.4 trillion posts.⁶³
2. Much like a search engine, Brandwatch uses an automated software program, known as a crawler, to download web pages into its database. The web pages are then analyzed and indexed based on the information found on each web page.⁶⁴ It is important to note that Brandwatch can only gather data from publicly available sources. This means that the Brandwatch database does not contain any data from private web pages, blogs, and posts. This includes social media posts that contain links to private accounts or websites.
3. Additionally, Brandwatch collects social media data from Twitter. To include Facebook and Instagram content, the user must add specific Instagram or Facebook accounts so that the Brandwatch crawler knows to provide data for those pages. Therefore, the social media data in Brandwatch is primarily Twitter content.
4. Once the publicly available data is saved in Brandwatch's database, any Brandwatch user can access this data at the direction of a query. Queries are made up of keywords and terms relevant to a brand, topic, or person of interest. Each section of the query is combined using Boolean operators, which are simple words or symbols that give a computer some criteria to use when searching.⁶⁵ A list of Boolean operators is found at Document 3q and the commonly used Boolean operators used in my query include:
 - **AND** - The AND operator allows the query writer to group multiple words or terms together. The AND operator is exclusive, meaning all the words or terms used with the AND operator must appear in the results. The AND operator helps add context to query

⁶³ Document 3g: Brandwatch – Consumer Research

⁶⁴ Document 3i: Brandwatch – Magpie Crawler

⁶⁵ Document 3h: Brandwatch – How to Write a Good Query

strings and is especially useful when searching for non-specific words or terms. For example, if someone is looking for the brand Apple to appear in their search results, the AND operator can add other keywords like “computer” or “iPhone,” which are words commonly associated with the Apple brand. Without the AND operator, irrelevant search results will appear, such as “apple juice” or “apple pie.” To avoid irrelevant results, the AND operator can be combined with other keywords and terms to add clarity to the query string.

- OR - The OR operator allows the query writer to list multiple words to be included in the search. The OR operator is not exclusive, meaning the words or terms connected using the OR operator do not all have to appear together in the results. For example, if someone is looking for Google+ to appear in their search results, they may write “Google+” OR “Google Plus” to search for results that include either term. The OR operator can also be used to pair unrelated terms.
- * - The wildcard operator, or asterisk, searches for all results that include the root word specified in the query. For example, if someone is looking for the word complain, they can enter “complain*” in their query and it will produce results that include complain, complaints, complaint, complained, etc. The wildcard operator is helpful when a searcher is looking for variations of a term and does not want to type out each variation.
- “ ” - Quotation marks are used to group words so that only results containing the exact term in the quotation marks appear.

5. Queries that are generic, do not contain unique terms, or contain several additive operators may generate a broad range of results. In these cases, categories can be added to filter the dataset and provide subgroups with more narrow and relevant results.⁶⁶
6. This overview provides a general understanding of how data is gathered within Brandwatch. The following sections will explain the query, categories, and additional filtering tools relied on to develop the dataset for my analysis.

⁶⁶ Document 3n: Brandwatch - Categories

A. Brandwatch Query

7. The query created for my investigation includes keywords and search terms that can potentially produce relevant results related to the Defamation Campaign. Each section of the query is connected using the OR operator, meaning each section is additive. In other words, the results produced during each command will not cancel out or restrict the results produced under other commands.
8. I limited the query search timeframe to only include results after February 2021, as this is when the Defamation Campaign began. This resulted in an estimated 28.58 million total mentions by 3.49 million unique authors.⁶⁷ Each section of the query is explained in the following subsections.

i) Section 1: Mentions of Mike Lindell, Smartmatic, or Keywords Related to the Defamation Campaign

9. The Section 1 command produces results, including any website, blog, or social media post that mentions Mike Lindell, the Absolute Documentary Series, the Cyber Symposium, the Media Appearances, and the Post-Complaint Defamation events. To ensure all relevant results appear, this command also includes (1) variations in the spelling of the titles of the programs to account for potential spelling errors, (2) related parties, such as the hosts of the programs, and (3) additional related terms that a person may search to access the articles, comments, or videos related to the Defamation Campaign ("Defamation Campaign Keywords").

```
(( "Mike Lindell" OR "Lindell" OR "My Pillow Guy" OR "MyPillow Guy" OR
"Lindell*" OR "Mike Lindell*" OR "Cyber Symposium" OR "Mike Lindell's
Cyber Symposium" OR "Absolute Proof" OR "Absolute-Proof" OR "Absolute
Interference" OR "absolute-interference" OR "Scientific Proof" OR
"scientific-proof" OR "Absolute 9-0" OR "absolute-9-0" OR "absolutely-9-0"
OR "Absolutely 9-0" OR "War Room" OR "warroom" OR "Steve Bannon*" OR "OAN"
OR "OANN" OR "OAN Real America" OR "OANN Real America" OR "Real America"
OR "Dan Ball*" OR "Pete Santilli Show" OR "Pete Santilli*" OR "Eric
Metaxas Radio Show" OR "Eric Metaxas*" OR "Indivisible" OR "John
Stubbins*" OR "USA Watchdog" OR "Greg Hunter*" OR "OAN Newsroom" OR "OANN
Newsroom" OR "Pearson Sharp*" OR "Screening of Absolute Proof" OR "Jimmy
Kimmel" OR "Updates on the Smartmatic Lawsuit and the Cast Vote Records"
OR "smartmatic" OR "smartmatic*" ) )
```

⁶⁷ Document 7a: Brandwatch Query Results. According to Brandwatch, this number is an estimate.

10. The Defamation Campaign Keywords included in the Section 1 command were also used in Sections 2, 3, 4, and 6.

ii) Section 2: Mentions that tag Lindell and include the Defamation Campaign Keywords

11. The Section 2 command produces results—including any Twitter post—that tag Mike Lindell's account, @realMikeLindell, and mentions one or more Defamation Campaign Keywords.

```
OR ((engagingWith:@realMikeLindell) AND ("Mike Lindell" OR "Lindell" OR
"My Pillow Guy" OR "MyPillow Guy" OR "Lindell*" OR "Mike Lindell*" OR
"Cyber Symposium" OR "Mike Lindell's Cyber Symposium" OR "Absolute Proof"
OR "Absolute-Proof" OR "Absolute Interference" OR "absolute-interference"
OR "Scientific Proof" OR "scientific-proof" OR "Absolute 9-0" OR
"absolute-9-0" OR "absolutely-9-0" OR "Absolutely 9-0" OR "War Room" OR
"warroom" OR "Steve Bannon*" OR "OAN" OR "OANN" OR "OAN Real America" OR
"OANN Real America" OR "Real America" OR "Dan Ball*" OR "Pete Santilli
Show" OR "Pete Santilli*" OR "Eric Metaxas Radio Show" OR "Eric Metaxas*"
OR "Indivisible" OR "John Stubbins*" OR "USA Watchdog" OR "Greg Hunter*"
OR "OAN Newsroom" OR "OANN Newsroom" OR "Pearson Sharp*" OR "Screening of
Absolute Proof" OR "Jimmy Kimmel" OR "Updates on the Smartmatic Lawsuit
and the Cast Vote Records" OR "smartmatic" OR "smartmatic*"))
```

iii) Section 3: Mentions that Link Frankspeech, Rumble, or BitChute and utilize the Defamation Campaign Keywords

12. The Section 3 command produces any website, blog, or social media post containing a link to the Absolute Documentary Series on Frankspeech and one or more Defamation Campaign Keywords. The Section 3 command also produces any website, blog, or social media post containing a link to Rumble.com or Bitchute.com and one or more of the Defamation Campaign Keywords.

```
OR ((links:frankspeech.com/Video/absolute-proof-exposing-election-fraud-
and-theft-america-enemies-foreign-and-domestic OR
links:frankspeech.com/Video/scientific-proof-internationally-renowned-
physicist-absolutely-proves-2020-election-was OR
links:frankspeech.com/video/absolute-interference-sequel-absolute-proof-
new-evidence-foreign-and-domestic-enemies-used OR
links:frankspeech.com/video/mike-lindell-presents-absolutely-9-0 OR
links:rumble.com OR links:bitchute.com) AND (((("Mike Lindell" OR "Lindell"
OR "My Pillow Guy" OR "MyPillow Guy" OR "Lindell*" OR "Mike Lindell*" OR
"Cyber Symposium" OR "Mike Lindell's Cyber Symposium" OR "Absolute Proof"
OR "Absolute-Proof" OR "Absolute Interference" OR "absolute-interference"
OR "Scientific Proof" OR "scientific-proof" OR "Absolute 9-0" OR
"absolute-9-0" OR "absolutely-9-0" OR "Absolutely 9-0" OR "War Room" OR
"warroom" OR "Steve Bannon*" OR "OAN" OR "OANN" OR "OAN Real America" OR
"OANN Real America" OR "Real America" OR "Dan Ball*" OR "Pete Santilli
Show" OR "Pete Santilli*" OR "Eric Metaxas Radio Show" OR "Eric Metaxas*"
OR "Indivisible" OR "John Stubbins*" OR "USA Watchdog" OR "Greg Hunter*"
OR "OAN Newsroom" OR "OANN Newsroom" OR "Pearson Sharp*" OR "Screening of
Absolute Proof" OR "Jimmy Kimmel" OR "Updates on the Smartmatic Lawsuit
and the Cast Vote Records" OR "smartmatic" OR "smartmatic*")))))
```

iv) Section 4: Anything Lindell posts that includes the Defamation Campaign Keywords

13. The Section 4 command produces results, including any Twitter post—by Mike Lindell, @realMikeLindell, that mentions one or more of the Defamation Campaign Keywords.

```
OR (author:(@realMikeLindell) AND ("Mike Lindell" OR "Lindell" OR "My
Pillow Guy" OR "MyPillow Guy" OR "Lindell*" OR "Mike Lindell*" OR "Cyber
Symposium" OR "Mike Lindell's Cyber Symposium" OR "Absolute Proof" OR
"Absolute-Proof" OR "Absolute Interference" OR "absolute-interference" OR
"Scientific Proof" OR "scientific-proof" OR "Absolute 9-0" OR "absolute-9-
0" OR "absolutely-9-0" OR "Absolutely 9-0" OR "War Room" OR "warroom" OR
"Steve Bannon*" OR "OAN" OR "OANN" OR "OAN Real America" OR "OANN Real
America" OR "Real America" OR "Dan Ball*" OR "Pete Santilli Show" OR "Pete
Santilli*" OR "Eric Metaxas Radio Show" OR "Eric Metaxas*" OR
"Indivisible" OR "John Stubbins*" OR "USA Watchdog" OR "Greg Hunter*" OR
"OAN Newsroom" OR "OANN Newsroom" OR "Pearson Sharp*" OR "Screening of
Absolute Proof" OR "Jimmy Kimmel" OR "Updates on the Smartmatic Lawsuit
and the Cast Vote Records" OR "smartmatic" OR "smartmatic*"))
```

v) Section 5: Mentions that include both hashtags for Smartmatic and Lindell

14. The following command produces Twitter posts with hashtags #smartmatic and #mikelindell.

```
OR (#smartmatic AND #mikelindell)
```

vi) Section 6: Anytime Lindell's websites, Twitter, Facebook, Rumble, or BitChute include the Defamation Campaign Keywords

15. The following command produces results from Frankspeech, LindellTV, michaeljlindell.com, twitter.com, rumble.com, bitchute.com, and facebook.com, including one or more of the Defamation Campaign Keywords. While the Section 4 command searches for specific links, the Section 6 command looks at specific websites to find the Defamation Campaign Keywords. In other words, the results show any article on the listed websites that include one or more of the Defamation Campaign Keywords.

```
OR ((site:twitter.com OR site:frankspeech.com OR site:lindelltv.com OR
site:michaeljlindell.com OR site:rumble.com OR site:bitchute.com OR
site:facebook.com) AND (((("Mike Lindell" OR "Lindell" OR "My Pillow Guy"
OR "MyPillow Guy" OR "Lindell*" OR "Mike Lindell*" OR "Cyber Symposium" OR
"Mike Lindell's Cyber Symposium" OR "Absolute Proof" OR "Absolute-Proof"
OR "Absolute Interference" OR "absolute-interference" OR "Scientific
Proof" OR "scientific-proof" OR "Absolute 9-0" OR "absolute-9-0" OR
"absolutely-9-0" OR "Absolutely 9-0" OR "War Room" OR "warroom" OR "Steve
Bannon*" OR "OAN" OR "OANN" OR "OAN Real America" OR "OANN Real America"
OR "Real America" OR "Dan Ball*" OR "Pete Santilli Show" OR "Pete
Santilli*" OR "Eric Metaxas Radio Show" OR "Eric Metaxas*" OR
"Indivisible" OR "John Stubbins*" OR "USA Watchdog" OR "Greg Hunter*" OR
"OAN Newsroom" OR "OANN Newsroom" OR "Pearson Sharp*" OR "Screening of
Absolute Proof" OR "Jimmy Kimmel" OR "Updates on the Smartmatic Lawsuit
and the Cast Vote Records" OR "smartmatic" OR "smartmatic*")))))
```

B. Categorization by Event

16. Categories allow for subgroups to be created within the dataset produced by the query.⁶⁸ Since a category is made from the query dataset, the commands for a category do not need to be as long or complex. I relied on several categories since the dataset created by the query was large and contained data irrelevant to this Case.
17. Furthermore, I limited each category to a specific timeframe in which the relevant results were most prevalent to reduce irrelevant results. I understand relevant website articles, blogs, and

⁶⁸ Document 3n: Brandwatch - Categories

social media posts may fall outside the assigned timeframe. As such, my calculation of the number of relevant results is conservative.

18. A summary of relevant mentions is presented in Schedule 2a. The following subsections explain how I used categories to organize and narrow the query dataset based on each key event of the Defamation Campaign.

i) Absolute Proof Category

19. The Absolute Proof category filters the larger query dataset only to show the results that mention “Absolute Proof” or “Absolute-Proof,” the first instalment of the Absolute Documentary Series. I then limited the search to include results from February 5, 2021, to March 5, 2021. This timeframe was selected as it spans from the “Absolute Proof” release date to one month after its release. To further narrow the results, this category utilizes the NOT operator to reduce the prevalence of the terms “Fox,” “book,” “bible,” “Bigfoot,” “medicine,” “real faith,” and “razzie” because there were a considerable number of irrelevant results containing these terms.

```
("Absolute Proof" OR "Absolute-Proof") NOT ("Fox" OR "book" OR "bible" OR "Bigfoot" OR "medicine" OR "real faith" OR "razzie")
```

20. The results were then reviewed to determine if they are relevant to this Case. Due to the significant number of results within this category, relevance was determined using a combination of search words related to each event. In this case, a mention is considered relevant if the “Title” or “Snippet” contains “Absolute Proof” or “Absolute” and at least one of the following keywords: “Documentary,” “Lindell,” “Mike,” “Smartmatic,” “Machines,” or “Pillow.” Additionally, a mention is considered relevant if the Title or Snippet contains “Absolute Proof” or “Absolute” and the “URL” or “Expanded URL” contains either “Lindell” or “Frank.” This indicates that the mention includes a link to LindellTV, Frankspeech, or a third-party website that posted or mentions Lindell or the Absolute Proof documentary.

ii) Scientific Proof Category

21. The Scientific Proof category filters the larger query dataset only to show the results that mention “Scientific Proof” or “scientific-proof,” the second instalment of the Absolute Documentary Series. I then limited the search to include results from March 27, 2021, to April 11, 2021. This

timeframe was selected as it spans from one week before the release of “Scientific Proof” to one week after. This timeframe is particularly restrictive as the keyword “scientific proof” is used within various contexts. To further narrow the results, this category utilizes the NOT operator to reduce the prevalence of the terms “Bible,” “religious,” “religion,” “faith,” “lawsuit,” “lawsuit*,” “sue,” “suing,” “sue*,” “Apple,” “Climate Change,” “Trans Women,” “biologically,” “cancer,” “virus,” “COVID,” “death,” “illness,” or “mask” because there were a considerable number of irrelevant results containing these terms.

```
((("Scientific Proof" OR "scientific-proof") NOT ("Bible" OR "religious" OR
"religion" OR "faith" OR "lawsuit" OR "lawsuit*" OR "sue" OR "suing" OR
"sue*" OR "Apple" OR "Climate Change" OR "Trans Women" OR "biologically"
OR "cancer" OR "virus" OR "COVID" OR "Death" OR "illness" OR "mask")))
```

22. The results were then reviewed to determine if they are relevant to this Case. Since the term “scientific proof” is used in various contexts, I determined if each mention was relevant to this Case by manually reviewing each result.

iii) Absolute Interference Category

23. The Absolute Interference segment filters the larger query dataset to only show the results that mention “Absolute Interference” or “Absolute-interference,” the third instalment of the Absolute Documentary Series. I then limited the search to include results from March 22, 2021, to May 22, 2021. This timeframe spans from one month before the release of “Absolute Interference” to one month after its release. To further narrow the results, this category utilizes the NOT operator to reduce the prevalence of the terms “suing,” “sue,” “lawsuit,” “pay*,” “sued,” “lawsuits,” and “sues” because there were a considerable number of irrelevant results containing these terms.

```
((("Absolute Interference" OR "Absolute-interference")) NOT (("suing" OR
"sue" OR "lawsuit" OR "pay*" OR "sued" OR "lawsuits" OR "sues")))
```

24. The results were then reviewed to determine if they are relevant to this Case. Due to the significant number of results within this category, relevance was determined using a combination of search words related to each event. In this case, a mention is considered relevant if the Title and Snippet contain “Interference” and at least one of the following keywords: “Lindell,” “Mike,” “Smartmatic,” “Frankspeech,” “Machine,” “Pillow,” “Fraud,” or “China.” Additionally, a mention is considered relevant if the Title or Snippet contains “Interference” and the URL or

Expanded URL contains either “Lindell,” “Frank,” or “Absolute,” as the mention includes a link to LindellTV, Frankspeech, or to a third-party website that posted or mentions Lindell or the Absolute Interference documentary.

iv) Absolute 9-0 Category

25. The Absolute 9-0 segment filters the larger query dataset to only show the results that mention the terms “Absolute 9-0,” “absolute-9-0,” “Absolutely 9-0,” or “absolutely-9-0.” Within my research, it became clear that individuals refer to the final instalment of the Absolute Documentary Series as both “Absolute 9-0” and “Absolutely 9-0.” Therefore, I included variations of both terms in my search. I then limited the search to include results from May 5, 2021, to July 6, 2021. This timeframe spans from one month before the release of “Absolute 9-0” to one month after its release. To further narrow the results, this category utilizes the NOT operator to reduce the prevalence of the terms “suing,” “sue,” “lawsuit,” “pay*,” “sued,” “lawsuits,” and “sues” because there were a considerable number of irrelevant results containing these terms.

```
(( "Absolute 9-0" OR "absolute-9-0" OR "Absolutely 9-0" OR "absolutely-9-0" )) NOT ( ( "suing" OR "sue" OR "lawsuit" OR "pay*" OR "sued" OR "lawsuits" OR "sues" ) )
```

26. The results were reviewed to determine if they are relevant to this Case. Due to the significant number of results within this category, relevance was determined using a combination of search words related to each event. In this case, a mention is considered relevant if the Title or Snippet contains “Absolute 9-0” or “Absolute” and at least one of the following keywords: “Lindell,” “Mike,” “Smartmatic,” “Pillow,” “Frankspeech,” “Frank,” “Machines,” or “Documentary.” Additionally, a mention is considered relevant if the Title or Snippet contains “Absolute 9-0” or “Absolute” and the URL or Expanded URL contain either “Lindell,” “Frank,” or “Absolute.” This indicates that the mention includes a link to LindellTV, Frankspeech, or a third-party website that posted or mentioned Lindell or the Absolute 9-0 documentary.

v) War Room Category

27. The War Room category filters the larger query dataset to only show the results related to Steve Bannon's "War Room" Podcast. This category is made up of four different commands that are combined using OR statements. The commands include:

- Mentions that include variations of the term "Bannon" and the term "War Room" and contain at least one of the following: "machine," "machines," "Mike Lindell," "Lindell," or "Smartmatic."
- Mentions that include variations of the terms "Bannon" and "Lindell" and contain at least one of the following: "machine," "machines," "War Room," or "Smartmatic."
- Mentions that include variations of the term "Lindell" and the term "War Room" and contain at least one of the following: "machine," "machines," "Bannon," "Bannon's," or "Smartmatic."
- Mentions that include "Mike Lindell" or "Lindell" and "War Room."

28. I then limited the search to include results from February 5, 2021, to June 1, 2021. This timeframe was selected to fully account for Lindell's six "War Room" appearances related to the Defamation Campaign.

```

<<<Mentions of Bannon and War Room with Lindell, Smartmatic or Machines>>>
((( "Bannon" OR "Bannon's" OR "Bannon*") AND ("War Room")) AND ("machine"
OR "machines" OR "Mike Lindell" OR "Lindell" OR "Lindell*" OR "smartmatic"
OR "smartmatic*"))

<<<Mentions of Bannon and Lindell with Smartmatic, Machines, or War
Room>>>
OR ((( "Bannon" OR "Bannon's" OR "Bannon*") AND ("Mike Lindell" OR
"Lindell" OR "Lindell*")) AND ("machine" OR "machines" OR "War Room" OR
"Smartmatic" OR "smartmatic*"))

<<<Mentions of Lindell and War Room with Smartmatic, Bannon, or
Smartmatic>>>
OR ((( "Mike Lindell" OR "Lindell" OR "Lindell*") AND ("War Room") AND
("machine" OR "machines" OR "Bannon" OR "Bannon's" OR "Bannon*" OR
"Smartmatic" OR "smartmatic*"))))

<<<Mentions of Mike Lindell and War Room>>>
OR (( "Mike Lindell" OR "Lindell" OR "Lindell*") AND ("War Room"))

```

29. The results were then reviewed to determine if they are relevant to this Case. Due to the specificity of searching for the six “War Room” appearances related to the Defamation Campaign, I determined if each mention was relevant to this Case by manually reviewing each result.

vi) OANN Special Category

30. The OANN Special category filters the larger query dataset to only show results related to the OANN Special. This category is made up of three different commands that are combined using OR statements. The commands include:
- Mentions that include “Screening of Absolute Proof,” “OAN Special,” or “OANN Special” and contain at least one of the following: “machine,” “machines,” “Mike Lindell,” “Smartmatic,” or “Bannon.”
 - Mentions that include “Mike Lindell or “Mike Lindell’s” and contain at least one of the following terms: “Screening of Absolute Proof,” “OAN Special,” or “OANN Special.”

- Mentions that include “Bannon” and contain at least one of the following terms: “Screening of Absolute Proof,” “OAN Special,” or “OANN Special.”

31. I then limited the search to include results from February 5, 2021, to February 18, 2021. This timeframe was selected to include the release of “Absolute Proof,” the topic of the OANN Special, and extended to five days after the OANN Special aired. This timeframe was intentionally narrowed to prevent overlap with other specials that may have aired on OANN. To further narrow the results, this category utilizes the NOT operator to reduce the prevalence of the terms “NAACP,” “vaccine,” and “anti-semitic” because there were a considerable number of irrelevant results containing these terms.

```
<<<Mentions of the OANN Special with Smartmatic, machines, Lindell, or
Bannon with exclusions specific to the data set>>>
(("Screening of Absolute Proof" OR "OAN Special" OR "OANN Special")) AND
(("machine" OR "machines" OR "Mike Lindell" OR "Mike Lindell's" OR
"smartmatic" OR "smartmatic*" OR "Bannon")) NOT ("NAACP" OR "vaccine" OR
"anti-semitic")

<<<Mentions of Lindell and the OANN Special with exclusions specific to
the data set>>>
OR (("Mike Lindell" OR "Mike Lindell's") AND ("Screening of Absolute
Proof" OR "OAN Special" OR "OANN Special")) NOT ("NAACP" OR "vaccine" OR
"anti-semitic")

<<<Mentions of Bannon and the OANN Special with exclusions specific to the
data set>>>
OR ("Bannon") AND ("Screening of Absolute Proof" OR "OAN Special" OR
"OANN Special")) NOT ("NAACP" OR "vaccine" OR "anti-semitic")
```

32. The results were then reviewed to determine if they are relevant to this Case. Due to the specificity of searching for one specific OANN Special, I determined if each mention was relevant to this Case by manually reviewing each result.

vii) Real America with Dan Ball Category

33. The Real American with Dan Ball category filters the larger query dataset only to show the results related to Real American with Dan Ball. This category is made up of four different commands that are combined using OR statements. The commands include:

- Mentions that include variations of the terms “Dan Ball” and “OANN Real America” and contain at least one of the following words: “machine,” “machines,” “Mike Lindell,” “Lindell,” or “Smartmatic.”
- Mentions that include variations of terms “Dan Ball” and “Lindell” and contain at least one of the following words: “machine,” “machines,” “OAN,” “OANN,” “OAN Real America,” “OANN Real America,” or “Smartmatic.”
- Mentions that include variations of the terms “Lindell” and “OANN Real America” and contain at least one of the following words: “machine,” “machines,” “Dan Ball,” “Ball,” or “Smartmatic.”
- Mentions that include “Mike Lindell” or “Lindell” and “Real America,” “OAN Real America,” or “OANN Real America.”

34. I then limited the search to include results from February 5, 2021, to March 8, 2021. This timeframe spans from the release of “Absolute Proof” to one month after OANN aired this segment of “Real America.”

```

<<<Mentions of Ball and Real America with Smartmatic, Lindell, or
machines>>>
((( "Dan Ball" OR "Ball's" OR "Ball*") AND ("Real America" OR "OAN" OR
"OANN" OR "OAN Real America" OR "OANN Real America")) AND ("machine" OR
"machines" OR "Mike Lindell" OR "Lindell" OR "Lindell*" OR "smartmatic" OR
"smartmatic*"))

<<<Mentions of Ball and Lindell with Smartmatic, machines, or Real
America>>>
OR ((( "Dan Ball" OR "Ball's" OR "Ball*") AND ("Mike Lindell" OR "Lindell"
OR "Lindell*")) AND ("machine" OR "machines" OR "OAN" OR "OANN" OR "OAN
Real America" OR "OANN Real America" OR "Smartmatic" OR "smartmatic*"))

<<<Mentions of Lindell and Real America with Smartmatic, Ball, or
machines>>>
OR (("Mike Lindell" OR "Lindell" OR "Lindell*") AND (("OAN" OR "OANN" OR
"OAN Real America" OR "OANN Real America") AND ("machine" OR "machines" OR
"Dan Ball" OR "Ball's" OR "Ball*" OR "Smartmatic" OR "smartmatic*")))

<<<Mentions of Mike Lindell and Real America>>>
OR (("Mike Lindell" OR "Lindell" OR "Lindell*") AND ("Real America" OR
"OAN Real America" OR "OANN Real America"))

```

35. A review of the results was then conducted to determine if the mentions are relevant to this Case. Due to the specificity of searching for one specific “Real America” segment on OANN, I determined if each mention was relevant to this Case by manually reviewing each result.

viii) The Pete Santilli Show Category

36. The Pete Santilli Show category filters the larger query dataset to only show the results related to the Pete Santilli Show. This category is made up of four different commands that are combined using OR statements. The commands include:
- Mentions that include “Pete” or “Santilli” and “Pete Santilli Show” and contain at least one of the following words: “machine,” “machines,” “Mike Lindell,” “Lindell,” or “Smartmatic.”
 - Mentions that include “Pete” or “Santilli” and variations of “Mike Lindell” or “Lindell” and contain at least one of the following words: “machine,” “machines,” “Pete Santilli Show,” or “Smartmatic.”

- Mentions that include “Mike Lindell” or “Lindell” and “Pete Santilli Show” and contain at least one of the following words: “machine,” “machines,” “Pete,” “Santilli,” or “Smartmatic.”
- Mentions that include “Mike Lindell” or “Lindell” and “Pete Santilli Show.”

37. I then limited the search to include results from February 5, 2021, to March 25, 2021. This timeframe spans from the release of “Absolute Proof” until one month after Lindell appeared on The Pete Santilli Show.

```
<<<Mentions of Pete Santilli and the Pete Santilli Show with Smartmatic,
Lindell, or machines>>>
((( "Pete" OR "Santilli" OR "Santilli*" ) AND ( "Pete Santilli Show" ) ) AND
( "machine" OR "machines" OR "Mike Lindell" OR "Lindell" OR "Lindell*" OR
"smartmatic" OR "smartmatic*" ))

<<<Mentions of Pete Santilli and Lindell with Smartmatic, Pete Santilli
Show, or machines>>>
OR ((( "Pete" OR "Santilli" OR "Santilli*" ) AND ( "Mike Lindell" OR
"Lindell" OR "Lindell*" ) ) AND ( "machine" OR "machines" OR "Pete Santilli
Show" OR "Smartmatic" OR "smartmatic*" ))

<<<Mentions of Lindell and the Pete Santilli Show with Smartmatic,
machines, or Pete Santilli>>>
OR ((( "Mike Lindell" OR "Lindell" OR "Lindell*" ) AND ( "Pete Santilli
Show" ) AND ( "machine" OR "machines" OR "Pete" OR "Santilli" OR "Santilli*"
OR "Smartmatic" OR "smartmatic*" )))

<<<Mentions of Mike Lindell and Pete Santilli Show>>>
OR ( ( "Mike Lindell" OR "Lindell" OR "Lindell*" ) AND ( "Pete Santilli
Show" ) )
```

38. A review of the results was then conducted to determine if the mentions are relevant to this Case. Due to the specificity of searching for one specific episode of The Pete Santilli Show, I determined if each mention was relevant to this Case by manually reviewing each result.

ix) The Eric Metaxas Radio Show Category

39. The Eric Metaxas Radio Show category filters the larger query dataset to only show the results related to the Eric Metaxas Radio Show. This category is made up of four different commands that are combined using OR statements. The commands include:

- Mentions that include “Eric” or “Metaxas” and “Eric Metaxas Radio Show” and contain at least one of the following words: “machine,” “machines,” “Mike Lindell,” “Lindell,” or “Smartmatic.”
- Mentions that include “Eric” or “Metaxas” and “Mike Lindell” or “Lindell” and contain at least one of the following words: “machine,” “machines,” “Eric Metaxas Radio Show,” or “Smartmatic.”
- Mentions that include “Mike Lindell” or “Lindell” and “Eric Metaxas Radio Show” and contain at least one of the following words: “machine,” “machines,” “Eric,” “Metaxas,” or “Smartmatic.”
- Mentions that include “Mike Lindell” or “Lindell” and “Eric Metaxas Radio Show.”

40. I then limited the search to include results from February 28, 2021, to April 30, 2021. This timeframe spans from one month before Lindell appeared on The Eric Metaxas Radio Show to one month after the appearance.


```

<<<Mentions of Eric Metaxas and the Eric Metaxas Radio Show with
Smartmatic, Lindell, or machines>>>
(((("Eric" OR "Metaxas" OR "Metaxas*") AND ("Eric Metaxas Radio Show")) AND
("machine" OR "machines" OR "Mike Lindell" OR "Lindell" OR "Lindell*" OR
"smartmatic" OR "smartmatic*"))

<<<Mentions of Eric Metaxas and Lindell with Smartmatic, Eric Metaxas
Radio Show, or machines>>>
OR (((("Eric" OR "Metaxas" OR "Metaxas*") AND ("Mike Lindell" OR "Lindell"
OR "Lindell*")) AND ("machine" OR "machines" OR "Eric Metaxas Radio Show"
OR "Smartmatic" OR "smartmatic*"))

<<<Mentions of Lindell and the Eric Metaxas Radio Show with Smartmatic,
Metaxas, or machines>>>
OR (((("Mike Lindell" OR "Lindell" OR "Lindell*") AND ("Eric Metaxas Radio
Show") AND ("machine" OR "machines" OR "Eric" OR "Metaxas" OR "Metaxas*"
OR "Smartmatic" OR "smartmatic*"))

<<<Mentions of Mike Lindell and the Eric Metaxas Radio Show>>>
OR (("Mike Lindell" OR "Lindell" OR "Lindell*") AND ("Eric Metaxas Radio
Show"))

```

41. A review of the results was then conducted to determine if the mentions are relevant to this Case. Due to the specificity of searching for one specific episode of The Eric Metaxas Radio Show, I determined if each mention was relevant to this Case by manually reviewing each result.

x) “Indivisible” with John Stubbins Category

42. The “Indivisible” with John Stubbins category filters the larger query dataset to only show the results related to “Indivisible” with John Stubbins. This category is made up of four different commands that are combined using OR statements. The commands include:
- Mentions that include “John Stubbins” or “Stubbins” and “Indivisible” and contain at least one of the following words: “machine,” “machines,” “Mike Lindell,” “Lindell,” or “Smartmatic.”
 - Mentions that include “John Stubbins” or “Stubbins” and “Mike Lindell” or “Lindell” and contain at least one of the following words: “machine,” “machines,” “Indivisible,” or “Smartmatic.”

- Mentions that include “Mike Lindell” or “Lindell” and “Indivisible” and contain at least one of the following words: “machine,” “machines,” “John Stubbins,” “Stubbins,” or “Smartmatic.”
- Mentions that include “Mike Lindell” or “Lindell” and “Indivisible.”

43. I then limited the search to include results from March 1, 2021, to May 1, 2021. This timeframe spans from one month before Lindell appeared on “Indivisible” to one month after the appearance.

```
<<<Mentions of John Stubbins and Indivisible with Smartmatic, Lindell, or
machines>>>
((( "John Stubbins" OR "Stubbins" OR "Stubbins*") AND ("Indivisible")) AND
("machine" OR "machines" OR "Mike Lindell" OR "Lindell" OR "Lindell*" OR
"smartmatic" OR "smartmatic*"))

<<<Mentions of Stubbins and Lindell with Smartmatic, Indivisible, or
machines>>>
OR ((( "John Stubbins" OR "Stubbins" OR "Stubbins*") AND ("Mike Lindell" OR
"Lindell" OR "Lindell*")) AND ("machine" OR "machines" OR "Indivisible" OR
"Smartmatic" OR "smartmatic*"))

<<<Mentions of Lindell and Indivisible with Smartmatic, Stubbins, or
machines>>>
OR ((( "Mike Lindell" OR "Lindell" OR "Lindell*") AND ("Indivisible") AND
("machine" OR "machines" OR "John Stubbins" OR "Stubbins" OR "Stubbins*"
OR "Smartmatic" OR "smartmatic*"))))

<<<Mentions of Mike Lindell and Indivisible>>>
OR (( "Mike Lindell" OR "Lindell" OR "Lindell*") AND ("Indivisible"))
```

44. A review of the results was then conducted to determine if the mentions are relevant to this Case. Due to the specificity of searching for one specific episode of “Indivisible,” I determined if each mention was relevant to this Case by manually reviewing each result.

xi) “USA Watchdog” Category

45. The “USA Watchdog” category filters the larger query dataset only to show the results related to “USA Watchdog.” This category is made up of four different commands that are combined using OR statements. The commands include:

- Mentions that include “Greg Hunter” or “Hunter” and “USA Watchdog” and contain at least one of the following words: “machine,” “machines,” “Mike Lindell,” “Lindell,” or “Smartmatic.”
- Mentions that include “Greg Hunter” or “Hunter” and “Mike Lindell” or “Lindell” and contain at least one of the following words: “machine,” “machines,” “USA Watchdog,” or “Smartmatic.”
- Mentions that include “Mike Lindell” or “Lindell” and “USA Watchdog” and contain at least one of the following words: “machine,” “machines,” “Greg Hunter,” “Hunter,” or “Smartmatic.”
- Mentions that include “Mike Lindell” or “Lindell” and “USA Watchdog.”

46. I then limited the search to include results from March 8, 2021, to May 9, 2021. This timeframe spans from one month before Lindell's appearance on “USA Watchdog” to one month after. To further narrow the results, this category utilizes the NOT operator to reduce the prevalence of the terms “Kimmel” and “Eric Metaxas” because there were a considerable number of irrelevant results containing these terms.

```

<<<Mentions of Hunter and USA Watchdog with Smartmatic, Lindell, or
machines with exclusions specific to the data set>>>
((((("Greg Hunter" OR "Hunter" OR "Hunter*") AND ("USA Watchdog")) AND
("machine" OR "machines" OR "Mike Lindell" OR "Lindell" OR "Lindell*" OR
"smartmatic" OR "smartmatic*")) NOT ("Kimmel" OR "Eric Metaxas"))

<<<Mentions of Hunter and Lindell with Smartmatic, USA Watchdog, and
machines with exclusions specific to the data set>>>
OR (((("Greg Hunter" OR "Hunter" OR "Hunter*") AND ("Mike Lindell" OR
"Lindell" OR "Lindell*")) AND ("machine" OR "machines" OR "USA Watchdog"
OR "Smartmatic" OR "smartmatic*")) NOT ("Kimmel" OR "Eric Metaxas"))

<<<Mentions of Lindell and USA Watchdog with Smartmatic, Hunter, and
machines with exclusions specific to the data set >>>
OR (((("Mike Lindell" OR "Lindell" OR "Lindell*") AND ("USA Watchdog") AND
("machine" OR "machines" OR "Greg Hunter" OR "Hunter" OR "Hunter*" OR
"Smartmatic" OR "smartmatic*")) NOT ("Kimmel" OR "Eric Metaxas"))

<<<Mentions of Mike Lindell and USA Watchdog with exclusions specific to
the data set>>>
OR (((("Mike Lindell" OR "Lindell" OR "Lindell*") AND ("USA Watchdog")) NOT
("Kimmel"))

```

47. A review of the results was then conducted to determine if the mentions are relevant to this Case. Due to the specificity of searching for one specific episode of “USA Watchdog,” I determined if each mention was relevant to this Case by manually reviewing each result.

xii) OANN “Newsroom” Category

48. The OANN “Newsroom” category filters the larger query dataset only to show the results related to the OANN “Newsroom.” This category is made up of four different commands that are combined using OR statements. The commands include:
- Mentions that include “Pearson Sharp” or “Sharp” and variations of the term “OANN Newsroom” and contain at least one of the following words: “machine,” “machines,” “Mike Lindell,” “Lindell,” or “Smartmatic.”
 - Mentions that include “Pearson Sharp” or “Sharp” and “Mike Lindell” or “Lindell” and contain at least one of the following words: “machine,” “machines,” “OAN,” “OANN,” “newsroom,” “OAN Newsroom,” or “OANN Newsroom,” or “Smartmatic.”

- Mentions that include “Mike Lindell” or “Lindell” and variations of the term “OANN Newsroom” and contain at least one of the following words: “machine,” “machines,” “Pearson Sharp,” “Sharp,” or “Smartmatic.”
- Mentions that include “Mike Lindell” or “Lindell” and “newsroom,” “OAN Newsroom,” or “OANN Newsroom.”

49. I then limited the search to include results from April 3, 2021, to June 3, 2021. This timeframe spans from one month before Lindell appeared on OANN’s “Newsroom” to one month after the appearance.

```
<<<Mentions of Sharp and OANN Newsroom with Smartmatic, Lindell, or
machines>>>
((( "Pearson Sharp" OR "Sharp" OR "Sharp*") AND ("OAN" OR "OANN" OR
"newsroom" OR "OAN Newsroom" OR "OANN Newsroom")) AND ("machine" OR
"machines" OR "Mike Lindell" OR "Lindell" OR "Lindell*" OR "smartmatic" OR
"smartmatic*"))

<<<Mention of Sharp and Lindell with Smartmatic, OANN Newsroom, or
machines>>>
OR ((( "Pearson Sharp" OR "Sharp" OR "Sharp*") AND ("Mike Lindell" OR
"Lindell" OR "Lindell*")) AND ("machine" OR "machines" OR "OAN" OR "OANN"
OR "newsroom" OR "OAN Newsroom" OR "OANN Newsroom" OR "Smartmatic" OR
"smartmatic*"))

<<<Mentions of Lindell and OANN Newsroom with Smartmatic, Sharp, or
machines>>>
OR ((( "Mike Lindell" OR "Lindell" OR "Lindell*") AND ("OAN" OR "OANN" OR
"newsroom" OR "OAN Newsroom" OR "OANN Newsroom") AND ("machine" OR
"machines" OR "Pearson Sharp" OR "Sharp" OR "Sharp*" OR "Smartmatic" OR
"smartmatic*"))))

<<<Mentions Mike Lindell and OANN Newsroom>>>
OR (( "Mike Lindell" OR "Lindell" OR "Lindell*") AND ("newsroom" OR "OAN
Newsroom" OR "OANN Newsroom"))
```

50. A review of the results was then conducted to determine if the mentions are relevant to this Case. Due to the specificity of searching for one specific “Newsroom” segment on OANN, I determined if each mention was relevant to this Case by manually reviewing each result.

xiii) Cyber Symposium Category

51. The Cyber Symposium category filters the larger query dataset only to show the results that mention “Cyber Symposium” or “Mike Lindell’s Cyber Symposium.” I then limited the search to include results from July 10, 2021, to September 13, 2021. This timeframe was selected as it spans from one month before the first day of the Cyber Symposium to one month after the event’s last day. To further narrow the results, this category utilizes the NOT operator to reduce the prevalence of the terms “lawsuit,” “sue,” and “suing,” or “Fox” because there were a considerable number of irrelevant results containing these terms.

```
("Cyber Symposium" OR "Mike Lindell's Cyber Symposium") NOT ("lawsuit" OR "lawsuit*" OR "sue" OR "suing" OR "sue*" OR "Fox")
```

52. A review of the results was then conducted to determine if the mentions are relevant to this Case. Due to the significant number of results within this category, I determined if each mention was relevant to this case by using a combination of search terms related to each event. In this case, a mention is considered relevant if the Title or Snippet contains “Cyber Symposium” or “Symposium” and at least one of the following keywords: “Lindell,” “Mike,” “Smartmatic,” “Codemonkey,” “machines,” “Pillow,” “election,” “fraud,” “China,” “Aug,” and “Sioux.” Additionally, a mention is considered relevant if the Title or Snippet contains “Cyber Symposium” or “Symposium” and the URL or Expanded URL contain “Lindell,” “Frank,” or “Symposium.” This indicates that the mention contains a link to LindellTV, Frankspeech, or a third-party website that posted or mentions Lindell or the Cyber Symposium.

xiv) Jimmy Kimmel Category

53. The Jimmy Kimmel category filters the larger query dataset only to show the results related to Jimmy Kimmel. This category is made up of two different commands that are combined using OR statements. The commands include:

- Mentions that include “Jimmy Kimmel” or “Kimmel” and contain at least one of the following words: “machine,” “machines,” “Mike Lindell,” “Lindell,” or “Smartmatic.”

- Mentions that include “Jimmy Kimmel” or “Kimmel” and “Mike Lindell” or “Lindell” and contain at least one of the following words: “machine,” “machines,” or “Smartmatic.”

54. I then limited the search to include results from January 3, 2023, to March 1, 2023. This timeframe spans from one month before Lindell appeared on *Jimmy Kimmel Live!* to one month after the appearance.

```
<<<Mentions of Kimmel and Smartmatic, Lindell, or machines>>>
(("Jimmy Kimmel" OR "Kimmel" OR "Kimmel*") AND ("machine" OR "machines" OR
"Mike Lindell" OR "Lindell" OR "Lindell*" OR "smartmatic" OR
"smartmatic*"))

<<<Mention of Kimmel and Lindell with Smartmatic or machines>>>
OR (((("Jimmy Kimmel" OR "Kimmel" OR "Kimmel*") AND ("Mike Lindell" OR
"Lindell" OR "Lindell*")) AND ("machine" OR "machines" OR "Smartmatic" OR
"smartmatic*")))
```

55. A review of the results was then conducted to determine if the mentions are relevant to this Case. Due to the specificity of searching for one specific *Jimmy Kimmel Live!* segment, I determined if each mention was relevant to this Case by manually reviewing each result.

xv) Updates on the Smartmatic Lawsuit and the Cast Vote Records Category

56. The following category filters the larger query dataset only to show the results that mention the term “Updates on the Smartmatic Lawsuit and Case Vote Records.” I then limited the search to include results from January 1, 2023, to March 1, 2023. This timeframe spans from one month before Lindell posted the “Updates on the Smartmatic Lawsuit and Cast Vote Records” video to one month after the video was posted.

```
((("Updates on the Smartmatic Lawsuit and Cast Vote Records")))
```

57. This yielded zero results. Therefore, no review was conducted.

C. Promo Code Analysis

58. Once I determined which mentions were relevant to this Case, I then determined the approximate number of mentions that either promoted the sale of My Pillow products or stated that a purchase was associated with the Defamation Campaign. To make this determination, I searched the Title and Snippet mentions that contain the following keywords: “promocode,” “promo code,” “buy,” “purchase,” “buying,” and “bought.” I then determined if each mention was relevant by manually reviewing each result. This review resulted in 1,122 mentions.⁶⁹

⁶⁹ Schedule 5b: Examples of Mentions Indicating Promotion or Purchases of MyPillow Products. For a full list, see Documents 8a through 8n.



Schedules for Doug Bania - Nevium Expert Report

**Smartmatic USA Corp., Smartmatic International Holding B.V., And SGO Corporation Limited
v.
Michael J. Lindell and MyPillow, Inc.**

List of Schedules

Schedule 1a	Timeline of Key Events
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Schedule 2a	Summary of the Internet and Social Media Investigation
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Schedule 3d	Media Appearances Video Views Investigation
Schedule 3e	Frankspeech Video Views Investigation
Schedule 4a	Relief Pay-Per-Click Calculation
Schedule 5a	MyPillow Financial Performance
Schedule 5b	Examples of Mentions Indicating Promotion or Purchases of MyPillow Products
Schedule 6a	Analysis of MyPillow Product Categories

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Timeline of Key Events*Schedule 1a*

Relevant Events		
Date	Comment	Source Document
2000	Smartmatic was founded by Antonio Mugica and Roger Pinate in Boca Raton, Florida.	Doc 1a, Paragraph 24
2016	Mr. Lindell first meets Donald Trump. Lindell later attended White House events and rallies in 2017, 2018, 2019, and 2020 while President Trump, in turn, endorsed Mr. Lindell and MyPillow.	Doc 1a, Paragraph 53-54
June 2018	Los Angeles County selected Smartmatic to help manufacture and implement a new election system for the County.	Doc 1a, Paragraph 35
3/3/2020	Smartmatic's election technology and software were successfully used in California's presidential primary in Los Angeles County. Polls indicated more than 85% of voters chose "excellent" or "good" when ask about their overall experience.	Doc 1a, Paragraph 43-44
November 2020	The November general election in Los Angeles was deemed a success. No questions were raised about security, reliability, or auditability of the results in Los Angeles County.	Doc 1a, Paragraph 46
11/12/2020	Members of the Election Infrastructure Government Coordinating Council Executive Committee and members of the Election Infrastructure Sector Coordinating Council published a joint statement regarding the security, reliability, and accuracy of the election results. It stated that the "November 3rd election was the most secure in American history...There is no evidence that any voting system deleted or lost votes, changed votes, or was in any way compromised."	Doc 1a, Paragraph 58-60
December 2020 - January 2021	Mr. Lindell began his attack on voting technology companies while sponsoring a 20-city "March for Trump" bus tour promoting the January 6, 2021 rally in Washington D.C.	Doc 1a, Paragraph 75-76
2/5/2021	The first installment of Mr. Lindell's four-part documentary series "Absolute" is first aired.	Doc 1a, Paragraph 86
February 2021 - May 2021	Mr. Lindell appeared on at least 13 media shows to spread his message about Smartmatic.	Doc 1a, Paragraph 111
August 10-12, 2021	Mr. Lindell hosted "Mike Lindell's Cyber Symposium" in a bid to prove that China helped Joe Biden steal the 2020 presidential election using voting machine technology.	Doc 1a, Paragraph 118
1/4/2023	Mr. Lindell posted a video titled Updates on the Smartmatic Lawsuit and the Cast Vote Records to his social media and website FrankSpeech.com	Doc 1a, Paragraph 131
2/1/2023	Mr. Lindell appeared on <i>Jimmy Kimmel Live!</i> where he maintained that computers could be "rigged out there, absolutely, in elections."	Doc 1a, Paragraph 136
August 16-17, 2023	Lindell hosts the "Lindell Election Summit" in Springfield, Missouri	Doc 3j

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Summary of the Events and Comments from Lindell's Defamation Campaign

Schedule 1b

Defamatory Videos						
Date	Defamation Campaign	Program	Individuals	Comments	Doc 1a, Paragraph:	Exhibit
2/5/2021	The "Absolute" Documentary Series	Absolute Proof	Mike Lindell, Mary Fanning, Phil Waldron, Matthew DePerno, Russell Ramsland, Shiva Ayyadurai, Patrick Colbeck, and Melissa Carone	Colonel Phil Waldron: So a critical capability for any of this to happen are the inherent vulnerabilities that were built into ES&S and Dominion software, which is, you know, again, we've proven through, through our work that this is all related directly back to the soft, Smartmatic, Smartmatic, SGO Smartmatic software core . And they definitely had financial gains to, financial reasons, based on some of the other investments that they've made. Especially they, you know, looking down the road, if they make billions and billions of dollars, the board of SGO Smartmatic , because they own a, an air purification company. So just think about it, if you get to pick an administration that is favorable to your company, say if they past the Green New Deal, and you're going to make billions and billions of dollars off of government-mandated air purification systems and public buildings and apartment buildings and industrial complexes, you know, you would spend quite a bit of money on the frontside to make sure the election was done.	86	1b
2/5/2021	Media Appearances	War Room	Mike Lindell, Steve Bannon	<p>Mike Lindell: So, this is all the new evidence I've been telling everybody about, this is what they're so afraid of Steve. Just today when this launched this morning, we've had over a million people view it and it has been taken down on Vizio. It has been taken down, other two sites crashed it, they're trying to attack it from every angle. You know what? If Dominion and Smartmatic, and don't forget Smartmatic they're right in there, I think that they're the ones that went after Fox.</p> <p>Mike Lindell: The reason they're suppressing this, and the reason they haven't sued me--by the way, a lot of those lawsuits are lies. They put it out there to scare networks not to talk about it. Okay, that's what they're doing. Steve, and it isn't just a different cast of experts. It's the evidence, the hard evidence in this, in this documentary these are the facts. There's nothing subjective, there's no subjectivity. It's all here's the facts, here's what happened on the first, second, third, fourth here's what happened each day, a print of what happened. So yeah, Dominion, Smartmatic both here.</p>	111, a	1c
2/6/2021	Media Appearances	War Room	Mike Lindell, Steve Bannon	<p>Mike Lindell: No, I, you know, I said whatever you guys need to do, because that, you know, at least they're brave enough to go out there and put this out there because you have you have places, every other cable company, cable channel is not going to put this out there because why? Because Smartmatic and Dominion sued them or threatened to sue them. I mean, it's not funny that they have perfect timing, that Smartmatic comes in and sues Fox yesterday and gets rid of Lou Dobbs.</p> <p>Mike Lindell: Let me tell you what I'm doing, I am going after Dominion and Smartmatic, I'm going after them with a lawsuit if this doesn't all come out to the public and they all get exposed and then and, and show what happened in our election because it's going to get out there or my next step is I sue Dominion and when I sue Dominion then it has to come out in court and I'll make sure that that's public.</p>	111, b	1d
2/8/2021	Media Appearances	OANN's Real America with Dan Ball	Mike Lindell, Dan Ball	Mike Lindell: What they're going to see is something they've never heard before, never seen and that's cyber forensics footprints. They're gonna, they're gonna see in there, but which country it came from; the ID of the computer, the IP address. Where it came over here, they have IP address of their computer broke into here, the actual ID number of the computer, and then how many votes were flipped, whether they got in or not, it's a cyber footprint it's what the government uses. When they if you did an investigation, this is what you'd be looking for. For that night. We have them from November 1 all the way through the election, and shows them a massive attack on our country by China and other country. China did 60% of this. It was all done through Dominion machines and and Smartmatic machines. That was the tool they used.	111, c	1e
2/11/2021	Media Appearances	OANN, A Screening and Conversation of Absolute Proof	Mike Lindell, Steve Bannon	Mike Lindell: This isn't about, I don't care if you're a Democrat or Republican. This was an attack on our country, these Dominion machines and Smartmatic , these machines that were, that are, that were this, that were the tools of this attack, and we will never have another fair election if we don't, if we don't stop that, so I will never back down.	111, d	1f
2/24/2021	Media Appearances	The Pete Santilli Show	Mike Lindell, Pete Stantilli	Mike Lindell: Hey, I you guys, I want every, I want everybody to know, I'm not going after just them and Smartmatic . I'm going, I want to go after Twitter, Facebook, Wikipedia, all the media, the media giants, you know, all these giants that are behind mainstream media. This problem runs so deep, and this canceled culture, and all this. But it's not just Dominion, it's a, and not just Smartmatic, and not just the machine. Look at what they're doing. They're all part of this attack on our country.	111, e	1g

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Summary of the Events and Comments from Lindell's Defamation Campaign

Schedule 1b

Defamatory Videos						
Date	Defamation Campaign	Program	Individuals	Comments	Doc 1a, Paragraph:	Exhibit
3/26/2021	Media Appearances	War Room	Mike Lindell, Steve Bannon	Mike Lindell: You know, everything they were bringing up before, you know, they were going, it was all there was a, you know, dead people voting and non-residents voting. I mean, he should, Donald Trump should have been put back in just for that alone. All these non-residents support all the cheating, I call that organic cheating, what I'm calling here is what they--what foreign countries, like China, came in and attacked our country using these machines; Dominion, Smartmatic , ESNF, all these machines.	111, f	1h
3/30/2021	Media Appearances	Eric Metaxas Radio Show	Mike Lindell, Eric Metaxas	Mike Lindell: Four to five weeks, I'm going to dump all this evidence for all to see every day on my new platform, Frank. Where the world can't suppress it, where every single person my audience, I believe, is a Democrat, just a Democrat that was wow trying to attack this. This came in, this foreign interference. They came in and stole this election through these machines, Dominion and Smartmatic . Everyone will get to see this over five weeks. There's a very, I have a very coordinated plan here.	111, g	1i
4/1/2021	Media Appearances	Indivisible	Mike Lindell, John Stubbins	Mike Lindell: And what's happening in our country, they're taking away our right to free speech, they're just suppressing everything, using-- if you say the word Dominion, Smartmatic , the vaccine being the mark of the beast, you talk about the borders, they're not going to have you on news, and they're gonna-- or they're gonna take away your your You Tubes and, and all that stuff. Mike Lindell: All the-- all my friends that have podcasts and they have, maybe they have radio shows even, and they they can't talk about things like the vaccine or the-- this election that was stole, you know, through the Dominion and Smartmatic machines-- they can't talk about the borders.	111, h	1j
4/3/2021	The "Absolute" Documentary Series	Scientific Proof	Mike Lindell, Dr. Douglas G. Frank	Mike Lindell: Taking away our first amendment right of free speech, which we're going with our new platform, which you probably haven't heard about it, it's called Frank. You'll be able to use free speech again right now. What Dominion did, what they've done. It's like, I said it before at My Pillow, if somebody was out there saying, Mike, there's rocks and knives in my pillows, I would say, no there's not, come and look, look at that, it's beautiful, patented fill. What Dominion and Smartmatic and the machines people, they didn't do that. They said, you're not looking at our machines. We're going to sue you and scare you all, live in fear, and we're gonna, or we're gonna threaten you with lawsuits.	94	1k
4/8/2021	Media Appearances	USA Watchdog	Mike Lindell, Greg Hunter	Mike Lindell: I have every single my, you know, minorities, major-norities, whatever you want to call every walk of life in my company. We're like a big family. And we we've been attacked before so we'll you know, like I say we we know we'll get through this. But what a shame. I want to say it one more time. What a shame that Dominion, sues My Pillow. And they sued Mike Lindell separately, but they sued My Pillow also. What how shameful they should be. Not only that, they're, you know what they did to our country them and Smartmatic , let's not forget Smartmatic , they're like the mothership of this. And for not only being involved in the biggest crime against our country, probably in history, well it will be in history of because it affects every person, but then they go and attack a company that had nothing to do with this.	111, i	1l
4/9/2021	Media Appearances	War Room	Mike Lindell, Steve Bannon	Mike Lindell: So this is a lawsuit that's for all of America, this is for the world actually. We're going after them in the biggest way possible, and we're not--we're including Smartmatic because now we've tied the two together. They're the mothership, all of that's gonna come out too, that evidence. They're all tied together in this corruption and this--and what went on to our country, the attack on our country, but this is why we're doing it.	111, j	1m
4/22/2021	The "Absolute" Documentary Series	Absolute Interference	Mike Lindell, General Michael Flynn, Dr. Douglas G. Frank	Mike Lindell: All these things and, and I kept telling them, you know what, and the reason they're doing that is because I have proof, 100% proof that our country was attacked by China, by communism coming in, this foreign interference to our elections, through the machines, Dominion, Smartmatic , ES&S, all of them.	99	1n
5/3/2021	Media Appearances	OANN's Newsroom	Mike Lindell, Pearson Sharp	Mike Lindell: And, and so then I, since then I've been obviously just fighting every day to get this, to tell the nation and everybody, the world these machines where it got hacked, Dominion, Smartmatic , Hart, all of them are the same, ES&S. You just say Dominion, but it's all machines. China hacked into our election and flipped millions upon millions of votes. And we have 100% evidence so I put out the two, three movies now, Absolute Proof, Scientific Proof.	111, k	1o
5/3/2021	Media Appearances	War Room	Mike Lindell, Steve Bannon	Mike Lindell: All this was going to be brought on too, it wasn't--Texas still had machines, all the machines are the same. They're all--you've got your ES&S, your Hart, your Diebold, your Dominion, and your mothership Smartmatic . So, I agree with him you know, to get all--we've got to fight at every level, we've got to you know. When the machines are gone, we do have to have no mail-in voting. We have to have one person, one vote, and we'll get to a great--when we, when we come out of this, it's going to be an amazing thing that we put into place, and it's going to be the--then it will actually be the fairest elections in world history.	111, l	1p

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Summary of the Events and Comments from Lindell's Defamation Campaign

Schedule 1b

Defamatory Videos						
Date	Defamation Campaign	Program	Individuals	Comments	Doc 1a, Paragraph:	Exhibit
5/8/2021	Media Appearances	War Room	Mike Lindell, Steve Bannon	Mike Lindell: Well, I've been, I've been living this since January ninth, I mean, this is what they do. Dominion, Smartmatic , all of them. It's just like, you talk to Matt DePerno in Michigan, and they've been going through this every day for months. And in Arizona, you know, it's just like, right now, when they find those--when they find their, you know, all the stuff that's missing, it doesn't surprise anyone. I think everybody knows now, this is the biggest cover-up that's probably in history for a crime. It's so massive that they've covered this up with the machine, or all the stuff that they did with the machines.	111, m	1q
6/5/2021	The "Absolute" Documentary Series	Absolute 9-0	Mike Lindell, anonymous guest	Mike Lindell: This was something different, nobody had seen. This was something that came through the machines, the Dominion machines, the Smartmatic and other machines. This was a cyber attack. I didn't know anything about cyber attacks. And boy, I learned, I had to learn real fast. And I hired experts to validate this, I hired, these guys are white hat hackers that work for the government. But what I'm going to show you tonight is, you're going to all know now, why I have been 100% sure that when this gets before the Supreme Court, it's gonna be 9-0, 9-0 to pull this election down, and that this was 100% an attack by China on our country through these machines.	107	1r
8/10/2021 - 8/12/2021	"Mike Lindell's Cyber Symposium"	Mike Lindell's Cyber Symposium	Mike Lindell, Douglas Frank, Phil Waldron, Joe Oltmann	Mike Lindell: You could have another attack over here with our all our credit cards. You could have com- big companies attacked, you could ever meet, you know, oh, anything attack, but if you attack an election, you only got to get through once. And that's it. You control it forever. You control the country. And they'll put in there oh, they're bringing it back to Venezuela. Venezuela is where the machine started. Smartmatic started in Venezuela. I got a whole big I've spent millions of dollars investigating this. They're built to take they're built as a tool to take countries.	118	1s
1/4/2023	Post-Complaint Defamation	Updates on the Smartmatic Lawsuit and the Cast Vote Records	Mike Lindell	Mike Lindell: I sued them after they sued Fox News on February 4th of '21. I sued Smartmatic first. They didn't sue me first. I went after them because they did law fair to our country and changed our livelihoods forever. I couldn't go on these other stations anymore and talk about machines or talk about our elections because of law fair, which hadn't been done in our country since the 1700s.	131	1t
2/1/2023	Post-Complaint Defamation	Jimmy Kimmel Live!	Mike Lindell, Jimmy Kimmel	Mike Lindell: You know, you can make fun of that, but we know the machines I'm talking about are voting machines. Computers used in elections because we wanna have elections and not selections.	136	1u

Themes

Smartmatic's voting technology and software was built as a tool to steal elections;
 Smartmatic was the "mothership" amongst all the voting machines used in the 2020 U.S. election;
 Smartmatic's technology and software are capable of being hacked or compromised; and
 Smartmatic and the other machines were the tool used by China to steal the election.

Note: The Comments section only includes a partial clip of the Defamatory Statements. For more details of the Defamatory Statements, please see the Complaint (Document 1a).

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Summary of the Internet and Social Media Investigation

Schedule 2a

Summary of Internet and Social Media Relevant Mentions																	
	Cyber Symposium	Absolute Proof	Absolute Interference	Absolute 9-0	Scientific Proof	OANN Special	War Room	Eric Metaxas Radio Show	OANN Newsroom	Real America	USA Watchdog	Pete Santilli Show	Indivisible	Jimmy Kimmel Live	Smartmatic Lawsuit	Total	
Source Document	8a	8b	8c	8d	8e	8f	8g	8h	8i	8j	8k	8l	8m	8n	7b		
Twitter	59,245	34,197	1,671	3,209	1,795	2,536	402	1	16	20	2	5	0	646	0	103,745	
News	2,449	911	49	52	36	48	312	208	6	0	3	0	0	0	0	4,074	
Forum	2,242	1,059	111	104	114	44	151	10	3	0	1	0	0	0	0	3,839	
Blog	1,763	747	118	96	55	36	83	13	9	0	2	0	2	0	0	2,924	
Reddit	486	128	9	5	2	6	1	1	0	0	0	0	0	0	0	638	
Tumblr	449	217	12	22	9	3	17	10	0	0	0	0	0	0	0	739	
YouTube	369	162	3	33	3	1	0	0	0	0	0	0	0	0	0	571	
Review	2	4	0	0	0	0	0	0	0	0	0	0	0	0	0	6	
Total Relevant Mentions	67,005	37,425	1,973	3,521	2,014	2,674	966	243	34	20	8	5	2	646	0	116,536	
Unique Authors	36,321	25,843	1,346	2,989	1,629	2,476	599	48	17	20	5	2	1	576	0	71,872	

Summary of Internet and Social Media Relevant Mentions					
	Cyber Symposium	Absolute Series	Media Mentions	Other	Total
Twitter	59,245	40,872	2,982	646	103,745
News	2,449	1,048	577	0	4,074
Forum	2,242	1,388	209	0	3,839
Blog	1,763	1,016	145	0	2,924
Reddit	486	144	8	0	638
Tumblr	449	260	30	0	739
YouTube	369	201	1	0	571
Review	2	4	0	0	6
Total Relevant Mentions	67,005	44,933	3,952	646	116,536
Unique Authors	36,321	31,807	3,168	576	71,872

Other Information																	
Total Mentions	72,076	49,695	2,358	3,730	4,384	14,325	2,659	788	520	20	303	5	12	657	0	151,532	
Total Authors	38,356	32,900	1,560	3,082	3,598	11,186	1,587	130	146	20	34	2	6	586	0	93,193	
Relevant "Blank" Authors	1,467	363	12	18	10	16	235	181	5	0	3	0	0	0	0	2,310	

Note: The Mentions data does not populate all Author names for each mention. In other words, some mentions have a "blank" in the Author category.

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Summary of Mentions Promoting or Indicating Intent to Purchase MyPillow Products*Schedule 2b*

Summary of Promotion or Purchasing Mentions																
	Cyber Symposium	Absolute Proof	Absolute Interference	Absolute 9- 0	Scientific Proof	OANN Special	War Room	Eric Metaxas Radio Show	OANN Newsroom	Real America	USA Watchdog	Pete Santilli Show	Indivisible	Jimmy Kimmel Live	Smartmatic Lawsuit	Total
Source Document	8a	8b	8c	8d	8e	8f	8g	8h	8i	8j	8k	8l	8m	8n	7b	
Mentions	748	361	1	0	3	4	4	0	0	0	0	0	0	1	0	1,122

Summary of Internet and Social Media Mentions					
	Cyber Symposium	Absolute Series	Media Mentions	Other	Total
Mentions	748	365	8	1	1,122

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Summary of Video Views Investigations*Schedule 3a*

Summary of Video Views			
Event Date	Program	Video Views	Schedule
2/5/2021	Absolute Proof	5,675,468	3b and 3e
2/5/2021	Steve Bannon's "War Room" Podcast	22,500	3d
2/6/2021	Steve Bannon's "War Room" Podcast	88,000	3d
2/8/2021	OANN's Real America with Dan Ball	43,300	3d
2/11/2021	OANN, A Screening and Conversation of Absolute Proof	661	3d
2/24/2021	The Pete Santilli Show	218,000	3d
3/26/2021	Steve Bannon's "War Room" Podcast	82,100	3d
3/30/2021	Eric Metaxas Radio Show	2,111,023	3d
4/1/2021	Indivisible	872	3d
4/3/2021	Scientific Proof	320,511	3b and 3e
4/8/2021	USA Watchdog	143,000	3d
4/9/2021	Steve Bannon's "War Room" Podcast	47,600	3d
4/22/2021	Absolute Interference	818,022	3b and 3e
5/3/2021	OANN's Newsroom	32,100	3d
5/3/2021	Steve Bannon's "War Room" Podcast	21,100	3d
5/8/2021	Steve Bannon's "War Room" Podcast	27,500	3d
6/5/2021	Absolute 9-0	703,626	3b and 3e
8/10/2021 - 8/12/2021	Cyber Symposium	9,376,609	3c and 3e
1/4/2023	Updates on the Smartmatic Lawsuit and the Cast Vote Records	0	3d and 7b
2/1/2023	Jimmy Kimmel Live!	2,088,000	3d
Total Views		21,819,992	
Total Videos		129	
Unique Chanel's		88	

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Absolute Documentary Series Video Views Investigation*Schedule 3b*

Video Views Related to the Absolute Documentary Series					
Website	Channel	Title	URL	Views	Source Document
Absolute Proof					
Rumble	DoctorFreedom	Mike Lindell Absolute Proof - Full Video	https://rumble.com/vdle3v-mike-lindell-absolute-proof-full-video.html	237,000	5a
Rumble	The Charlie Ward Show	ABSOLUTE PROOF MIKE LINDELL ELECTION DOCUMENTARY FULL - THE GOOD GUYS ATTACKED BY THE BAD GUYS	https://rumble.com/vdq6zf-absolute-proof-mike-lindell-election-documentary-full-the-good-guys-attaque.html	16,400	5b
Rumble	Right Side Broadcasting Network	ABSOLUTE PROOF DOCUMENTARY WITH MIKE LINDELL - NEVER BEFORE SEEN EVIDENCE ON ELECTION FRAUD	https://rumble.com/vdlq0r-absolute-proof-documentary-with-mike-lindell-never-before-seen-evidence-on-.html	284,000	5c
Rumble	The Pete Santilli Show	Absolute Proof - Mike Lindell's 2020 Election Fraud Documentary	https://rumble.com/vdlfht-absolute-proof-mike-lindells-2020-election-fraud-documentary.html	496,000	5d
Rumble	One America News Network	Absolute Proof with Mike Lindell	https://rumble.com/vdkz6j-absolute-proof-with-mike-lindell.html	518,000	5e
Rumble	CTROnline	Absolute Proof: Exposing Election Fraud and the Theft of America	https://rumble.com/vdlebn-mike-lindell-absolute-proof-exposing-election-fraud-and-the-theft-of-america.html	3,081,554	5f
BitChute	TruthVideos1984	MY PILLOW GUY MIKE LINDELL'S 'ABSOLUTE PROOF' DOCUMENTARY	https://www.bitchute.com/video/FwX3oxjHqhE2/	230,618	5g
BitChute	Banned Youtube Videos	Absolute Proof Mike Lindell	https://www.bitchute.com/video/FtRYtna3YYe9/	119,954	5h
BitChute	Dr Charlie Ward	ABSOLUTE PROOF MIKE LINDELL ELECTION DOCUMENTARY FULL - THE GOOD GUYS ATTACKED BY THE BAD GUYS	https://www.bitchute.com/video/3LHFijOQD0oy/	85,658	5i
BitChute	IPOT1776	Absolute Proof - Mike Lindell Film - IPOT Presents - 2.6.21	https://www.bitchute.com/video/W9QMdyO7YNN9/	48,528	5j
BitChute	MoreTruth	Mike Lindell - Absolute Proof	https://www.bitchute.com/video/jWix6lavLxpl/	47,524	5k
BitChute	It's a Consecrated Life	ABSOLUTE PROOF DOCUMENTARY - Mike Lindell	https://www.bitchute.com/video/5u6UI1306nbv/	36,711	5l
BitChute	CANST - Children are NOT Sex Toys / GMNo!	ABSOLUTE PROOF - MIKE LINDELL	https://www.bitchute.com/video/WyuK1VS3KsPf/	36,204	5m
BitChute	Banned Video Archive	Mike Lindell's Absolute Proof Documentary Proving Deception POSTED TODAY	https://www.bitchute.com/video/E8WrQRQ9jZ3a/	27,368	5n
BitChute	WVradioman	Absolute Proof >>Exposing Election Fraud.!!	https://www.bitchute.com/video/5Z2JfoNHUn9W/	21,302	5o
BitChute	PatriotsUnleashed.com	Mike Lindell - Absolute Proof	https://www.bitchute.com/video/JXgEVkNHWtBa/	19,118	5p
BitChute	THE_HIGH_COMMAND	ABSOLUTE PROOF (Historic Documentary by My Pillow CEO Mike Lindell About 2020 Election Fraud)	https://www.bitchute.com/video/qt3eP8OkBkx3/	18,379	5q
BitChute	Decisive Liberty Documentaries (archive)	MIKE LINDELL: ABSOLUTE PROOF - EXPOSING ELECTION FRAUD AND THE THEFT OF AMERICA	https://www.bitchute.com/video/ajWU3Az0Mzu4/	18,071	5r
BitChute	Sergeant Major	ABSOLUTE PROOF: EXPOSING ELECTION FRAUD TREASON [2021-02-05] - MIKE LINDELL (DOCUMENTARY VIDEO)	https://www.bitchute.com/video/ExIZhG6R1EnP/	17,125	5s
BitChute	Sons of Liberty Media	Absolute Proof: MyPillow's Mike Lindell Releases Long Promised Documentary of 2020 Voter Fraud	https://www.bitchute.com/video/C7215RAGnY6F/	16,982	5t
BitChute	cirstenw	Mike Lindell Absolute Proof of Rampant Voter Fraud in the USA	https://www.bitchute.com/video/2i3C8WYvfRVm/	15,837	5u
BitChute	ThebigaqakeningQ	Mike Lindell's Absolute Proof Documentary Proving Deception on the Faith Unveiled Network	https://www.bitchute.com/video/kpzyuyj8KZCA/	15,596	5v

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Absolute Documentary Series Video Views Investigation

Schedule 3b

Video Views Related to the Absolute Documentary Series					
Website	Channel	Title	URL	Views	Source Document
BitChute	The Resistance 1776	Absolute Proof - Mike Lindell's 2020 Election Fraud Documentary (Banned)	https://www.bitchute.com/video/hvx6Gqz8w0gp/	13,532	5w
BitChute	Decisive Liberty Documentaries (archive)	Mike Lindell - Absolute Proof: Exposing Election Fraud ... by Enemies Foreign and Domestic	https://www.bitchute.com/video/by6jozj4frAM/	13,342	5x
BitChute	BANNED.VIDEO	Watch Mike Lindell's Censored "Absolute Proof"	https://www.bitchute.com/video/uwv7rERAgG2R/	11,107	5y
BitChute	PenisWrinkle	Mike Lindell Absolute Proof	https://www.bitchute.com/video/40fFvby2oqWv/	11,045	5z
BitChute	Light_Souldiers	MIKE LINDELL EXPOSES VOTER FRAUD IN POWERFUL DOCUMENTARY CALLED ABSOLUTE PROOF	https://www.bitchute.com/video/DOGBHQldGiTW/	3,753	5aa
BitChute	honestjoe82	ABSOLUTE PROOF - SHORT VERSION	https://www.bitchute.com/video/FxbJFoOtBFa3/	445	5ab
BitChute	TruthVideos1984	MIKE LINDELL'S 'ABSOLUTE PROOF' DOCUMENTARY - ONLY THE IMPORTANT PART	https://www.bitchute.com/video/1KQpm4kDMAEH/	132,111	5ac
BitChute	XtremeRealityCheck	FULL VERSION "ABSOLUTE PROOF" DOCUMENTARY MOVIE BY MIKE LINDELL	https://www.bitchute.com/video/gtcxKIGz8wOI/	3,031	5ad
BitChute	CultKiller	MIKE LINDELL ABSOLUTE PROOF EXPOSING ELECTION FRAUD AND THE THEFT OF AMERICA	https://www.bitchute.com/video/w7m8tVcvTsMf/	733	5ae
BitChute	Net4TruthUSA	IGP ABSOLUTE PROOF RE-POST OF THE PILLOW DOCUMENTARY	https://www.bitchute.com/video/aXmyP4qs3J41/	6,284	5af
BitChute	Veritas show	MIKE LINDELL: ABSOLUTE PROOF - EXPOSING ELECTION FRAUD AND THE THEFT OF AMERICA	https://www.bitchute.com/video/fNm2vJxyHJyR/	1,341	5ag
BitChute	TheTruthSoldier	ABSOLUTE PROOF	https://www.bitchute.com/video/d0ZsVTSpZsvK/	1,243	5ah
BitChute	OYEmedia	ABSOLUTE PROOF - MIKE LINDELL	https://www.bitchute.com/video/QLmsV69AWwZy/	770	5ai
BitChute	Redpill Documentaries	MIKE LINDELL: ABSOLUTE PROOF: EXPOSING ELECTION FRAUD AND THE THEFT OF AMERICA	https://www.bitchute.com/video/MleqMkiXN5Ep/	2,366	5aj
BitChute	Don't Tread On Me	MIKE LINDELL'S CENSORED "ABSOLUTE PROOF" EXPOSING ELECTION THEFT	https://www.bitchute.com/video/FDn4kaFcGqHc/	1,403	5ak
BitChute	Patriotpapa's Rants and Rambling	ABSOLUTE PROOF	https://www.bitchute.com/video/ALjPRWuvDoR8/	610	5al
BitChute	DeanRochefortCoakley	ABSOLUTE PROOF / MIKE LINDELL / MY PILLOW GUY.	https://www.bitchute.com/video/apxBfPzpxXfq/	2,364	5am
BitChute	webpilot	MIKE LINDELL ABSOLUTE PROOF PART 1	https://www.bitchute.com/video/HEExqyRborjd/	301	5an
BitChute	Alpha17Warrior.club	ABSOLUTE PROOF - EXPOSING ELECTION FRAUD AND THEFT OF AMERICA - MIKE LINDELL OF MYPILLOW	https://www.bitchute.com/video/30ubKexxDLDG/	6,285	5ao
BitChute	Free Your Mind	ABSOLUTE PROOF [MIRRORED]	https://www.bitchute.com/video/VkxKSb7NtbiH/	7,917	5ap
BitChute	Free Speech Warrior	ABSOLUTE PROOF: EXPOSING ELECTION FRAUD AND THE THEFT OF AMERICA BY ENEMIES FOREIGN AND DOMESTIC	https://www.bitchute.com/video/G5cpoo30A8tn/	9,882	5aq
BitChute	TruthNewsNetwork	MYPILLOW'S MIKE LINDELL - ABSOLUTE PROOF [FULL]	https://www.bitchute.com/video/3KV4Sss0Q84S/	811	5ar
BitChute	The Michael Dade Project	THE MICHAEL DADE PROJECT BREAKING NEWS ABSOLUTE PROOF MIKE LINDELL DOCUMENTARY	https://www.bitchute.com/video/IFMDXVmLAok7/	953	5as
BitChute	Ethan Galstad	ABSOLUTE PROOF - MIKE LINDELL - ELECTION FRAUD DOCUMENTARY	https://www.bitchute.com/video/7LvAj2M9nAR4/	4,439	5at
BitChute	Based Backup	MIKE LINDELL - ABSOLUTE PROOF	https://www.bitchute.com/video/fSLtyUJzKu10/	6,931	5au
Total				5,650,928	

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Absolute Documentary Series Video Views Investigation

Schedule 3b

Video Views Related to the Absolute Documentary Series					
Website	Channel	Title	URL	Views	Source Document
Scientific Proof					
Rumble	Right Side Broadcasting Network	"Scientific Proof" Television Special on Election Fraud by Mike Lindell	https://rumble.com/vf8iq3-scientific-proof-television-special-on-election-fraud-by-mike-lindell.html	299,000	5av
Rumble	Dawn of Darkness Network (Politics)	"Scientific Proof" Documentary / Physicist Shows Data Proving Election Fraud / By Mike Lindell	https://rumble.com/vfcdxj-scientific-proof-documentary-physicist-shows-data-proving-election-fraud-by.html	376	5aw
BitChute	Banned Youtube Videos	Scientific Proof Mike Lindell	https://www.bitchute.com/video/Msb8YrkZQlc/	11,135	5ax
BitChute	Movie Classics Collection	MIKE LINDELL PRESENTS: "SCIENTIFIC PROOF 2021" / DOCUMENTARY	https://www.bitchute.com/video/wxL9SXbMiBUB/	1,480	5ay
BitChute	Jim Fetzer	MIKE LINDELL'S SCIENTIFIC PROOF THE 2020 ELECTION WAS STOLEN (FEATURING FAMOUS PHYSICIST)	https://www.bitchute.com/video/0A16T79BO7Hi/	3,991	5az
BitChute	Banned.Video	MIKE LINDELL PRESENTS SCIENTIFIC PROOF	https://www.bitchute.com/video/3NPKYEeDeVwP/	4,479	5ba
Total				320,461	
Absolute Interference					
Rumble	PatrickByrne	Mike Lindell Presents: Absolute Interference The Sequel to Absolute Proof 2020 Election Fraud	https://rumble.com/vfvgb7-mike-lindell-presents-absolute-interference-the-sequel-to-absolute-proof-20.html	275,000	5bb
Rumble	AMERICANDREAM09 with 17PLUS	Mike Lindell: Absolute Interference: The Sequel to Absolute Proof 2020 Election Fraud	https://rumble.com/vhq1i1-mike-lindell-absolute-interference-the-sequel-to-absolute-proof-2020-electi.html	195,000	5bc
Rumble	Great Awakening World - Truths & Secrets Revealed	Absolute Interference Documentary - The Sequel to Absolute Proof 2020 Election Fraud by Mike Lindell	https://rumble.com/vg0dxl-absolute-interference-documentary-the-sequel-to-absolute-proof-2020-electio.html	42,600	5bd
Rumble	Right Side Broadcasting Network	Absolute Interference with Mike Lindell	https://rumble.com/vfvgbn-absolute-interference-with-mike-lindell.html	20,400	5be
Rumble	ChristianPatriot News	Mike Lindell: Absolute Interference! NEW 2-Hour 2020 Election Documentary! 100% Proof China Stole It	https://rumble.com/vfzu6j-mike-lindell-absolute-interference-new-2-hour-2020-election-documentary-100.html	43,700	5bf
Rumble	Quadrillage Traduction	ABSOLUTE INTERFERENCE (VF)	https://rumble.com/vgessv-absolute-interference-vf.html	421	5bg
Rumble	mikelindell	China Puts Biden in the White House	https://rumble.com/vh6w0n-china-puts-biden-in-the-white-house.html	62,800	5bh
Rumble	DailyTruthReport	Mike Lindell's "Absolute Interference" [TRAILER]	https://rumble.com/vfnbpl-mike-lindells-absolute-interference-trailer.html?mref=6zof&mrefc=12	91,700	5bi
Rumble	mikelindell	Absolute Interference Trailer	https://rumble.com/vfjp03-absolute-interference-trailer.html	14,900	5bj
BitChute	Banned Youtube Videos	Mike Lindell Presents - ABSOLUTE INTERFERENCE FrankSpeech.com	https://www.bitchute.com/video/kSOOam4OaYZ8/	27,342	5bk
BitChute	Sergeant Major	ABSOLUTE INTERFERENCE [2021-04-20] - MIKE LINDELL (DOCUMENTARY VIDEO)	https://www.bitchute.com/video/KnFx2LWOkRUF/	19,259	5bl
Total				793,122	

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Absolute Documentary Series Video Views Investigation*Schedule 3b*

Video Views Related to the Absolute Documentary Series					
Website	Channel	Title	URL	Views	Source Document
Absolute 9-0					
Rumble	WeLoveTrump...by NOAH	Mike Lindell's "Absolutely 9-0"	https://rumble.com/vi07y9-mike-lindells-absolutely-9-0.html?mref=lzerp&mc=3ifeq	128,000	5bm
Rumble	The JD Rucker Show	Mike Lindell Presents: Absolutely 9-0	https://rumble.com/vi07af-mike-lindell-presents-absolutely-9-0.html?mref=lzerp&mrefc=3	36,000	5bn
BitChute	Freedom Rules	WATCH IT HERE: MIKE LINDELL'S "ABSOLUTE 9-0"	https://www.bitchute.com/video/y2x8g9QdzimD/	3,944	5bo
BitChute	NewsTreason.com	MIKE LINDELL: ABSOLUTE 9-0 ELECTION FRAUD DOCUMENTARY - INDISPUTABLE PROOF THE ELECTION WAS STOLEN!	https://www.bitchute.com/video/eoJkjeX7AVkf/	1,704	5bp
BitChute	JOHN_HENRY_3777	MIKE LINDELL PRESENTS ABSOLUTELY 9-0 BIDEN DID NOT WIN!!!	https://www.bitchute.com/video/S0RCXka3p1kK/	2,808	5bq
BitChute	tobyw	PROOF OF 2020 VOTER FRAUD!!! MIKE LINDELL RELEASES "ABSOLUTELY 9-0"	https://www.bitchute.com/video/VtRctTJ6jDdO/	1,598	5br
BitChute	The Red Pill Channel	MIKE LINDELL RELEASES "ABSOLUTELY 9-0"	https://www.bitchute.com/video/DM9LKqcPDQFY/	1,107	5bs
BitChute	TruthVideos1984	MIKE LINDELL PRESENTS ABSOLUTELY 9-0	https://www.bitchute.com/video/XvRoboHSAqXp/	24,576	5bt
BitChute	EarthNewspaper.com	MIKE LINDELL PRESENTS ABSOLUTELY 9-0	https://www.bitchute.com/video/yZ0yhfr1cFva/	1,664	5bu
BitChute	truthprotector247	MIKE LINDELLS ABSOLUTE 9-0	https://www.bitchute.com/video/NfyC0r8IHdbR/	801	5bv
BitChute	Robert David Steele	MIRROR: MIKE LINDELL PRESENTS: ABSOLUTELY 9-0	https://www.bitchute.com/video/W68LsevVS5M7/	11,872	5bw
Total				214,074	
Total				6,978,585	

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Cyber Symposium Video Views Investigation*Schedule 3c*

Cyber Symposium Videos					
Website	Channel	Title	URL	Views	Source Document
Rumble	KanekoaTheGreat	Mike Lindell Cyber Symposium - Col. Phil Waldron "Your Wake Up Call"	https://rumble.com/vkze5h-mike-lindell-cyber-symposium-your-wake-up-call-col-phil-waldron.html	3,650,000	4a
Rumble	The Pete Santilli Show	🔥 PETE SANTILLI LIVE @Mike Lindell's CYBER SYMPOSIUM Aug 10-12	https://rumble.com/vkxwco-pete-santilli-will-be-live-mike-lindells-cyber-symposium-aug-10-12.html	1,870,000	4b
Rumble	Patriot News Outlet Live	WATCH LIVE Patriot News Outlet Mike Lindell's Cyber Symposium Day 1 8/10/2021	https://rumble.com/vky68n-watch-live-patriot-news-outlet-mike-lindells-cyber-symposium-day-1-10am-es.html	1,040,000	4c
Rumble	The Charlie Kirk Show	MIKE LINDELL'S CYBER SYMPOSIUM — DAY TWO LIVE	https://rumble.com/vl08ku-d.c.s-dangerous-500000000000-24-hour-spending-spree-the-charlie-kirk-show-.html	95,500	4d
Rumble	Real America's Voice - Special Events	WATCH: Mike Lindell's Cyber Symposium day 2	https://rumble.com/vl05im-watch-mike-lindells-cyber-symposium-day-2.html	31,200	4e
Rumble	The Charlie Kirk Show	MIKE LINDELL'S CYBER SYMPOSIUM - DAY 2 LIVE CONTINUED	https://rumble.com/vl0pki-mike-lindells-cyber-symposium-day-2-live-continued.html	116,000	4f
Rumble	Patriot News Outlet Live	WATCH LIVE Patriot News Outlet Mike Lindell's Cyber Symposium Day 2 8/11/2021	https://rumble.com/vkzy5k-watch-live-patriot-news-outlet-mike-lindells-cyber-symposium-day-2-9am-est.html	217,000	4g
Rumble	The Pete Santilli Show - LIVE Show	DAY #2 - Mike Lindell's CYBER SYMPOSIUM - PeteLive.tv	https://rumble.com/vl0195-day-2-mike-lindells-cyber-symposium-petelive.tv.html	109,000	4h
Rumble	The Pete Santilli Show	DAY #2 - Mike Lindell's CYBER SYMPOSIUM - The Pete Santilli Show	https://rumble.com/vl0113-day-2-mike-lindells-cyber-symposium-the-pete-santilli-show.html	70,300	4i
Rumble	Real America's Voice - Special Events	Mike Lindell's Cyber Symposium Day 2	https://rumble.com/vl0syp-mike-lindells-cyber-symposium-day-2.html	13,600	4j
Rumble	Real America's Voice - Special Events	Mike Lindell's Cyber Symposium Day 3	https://rumble.com/vl1q0p-mike-lindells-cyber-symposium-day-3.html	64,200	4k
Rumble	Patriot News Outlet Live	WATCH LIVE Patriot News Outlet Mike Lindell's Cyber Symposium Day 3 8/12/2021	https://rumble.com/vl1owp-watch-live-patriot-news-outlet-mike-lindells-cyber-symposium-day-3-8122021.html	272,000	4l
Rumble	The Pete Santilli Show	🔥 BIG DAY! Everything On The Line @Mike Lindell's CYBER SYMPOSIUM	https://rumble.com/vl1ojb-big-day-everything-on-the-line-mike-lindells-cyber-symposium.html	58,300	4m
Rumble	The Pete Santilli Show	🔥 BIG DAY! Everything On The Line @Mike Lindell's CYBER SYMPOSIUM	https://rumble.com/vl1omx-big-day-everything-on-the-line-mike-lindells-cyber-symposium.html	71,400	4n
Rumble	Bannons War Room	MUST SEE: Damning Video Explaining How, Why and Who Stole Election	https://rumble.com/vkygqa-must-see-damning-video-explaining-how-why-and-who-stole-election.html	1,220,000	4o
Rumble	KanekoaTheGreat	Mike Lindell Cyber Symposium - Dr. Douglas Frank "2020 Election Algorithms"	https://rumble.com/vkzdlu-mike-lindells-cyber-symposium-dr.-douglas-frank.html	53,600	4p
Rumble	KanekoaTheGreat	Mike Lindell Cyber Symposium - Dr. Shiva Ayyadurai "Government with Big tech Destroys Free Speech"	https://rumble.com/vl151q-mike-lindell-cyber-symposium-dr.-shiva-ayyadurai-government-with-big-tech-d.html	256,000	4q

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Cyber Symposium Video Views Investigation*Schedule 3c*

Cyber Symposium Videos					
Website	Channel	Title	URL	Views	Source Document
Rumble	Iowa Mag	Dr. Shiva EXPOSES Big Tech and Censor Nazis	https://rumble.com/vl0pkz-dr.-shiva-exposes-big-tech-and-censor-nazis.html	32,500	4r
Rumble	HamGlazedSnickerdoodles	Dr. Shiva Uncovers SHOCKING Government & Big tech Censorship partnership	https://rumble.com/vl0u4d-dr.-shiva-reveals-shocking-government-and-big-tech-censorship-partnership.html	8,430	4s
Rumble	Research, Truth, Knowledge, & Hope	"Your Wake Up Call" Mike-Lindell's Cyber Symposium	https://rumble.com/vl00ty-your-wake-up-call-mike-lindells-cyber-symposium.html	574	4t
Rumble	Alpha Might Podcast	Retired U.S. Army Colonel Phil Waldron: Your Wake Up Call	https://rumble.com/vkyxju-retired-u.s.-army-colonel-phil-waldron-your-wake-up-call.html	3,250	4u
BitChute	Qanon	CYBER SYMPOSIUM: UPDATE FROM ARIZONA LEGISLATORS ON MARICOPA COUNTY FORENSIC AUDIT SUCCESS	https://www.bitchute.com/video/RO53bH5crXZ8/	4,692	4v
BitChute	Qanon	CYBER SYMPOSIUM: EDUARDO BOLSONARO 'BRAZILIAN ELECTION FRAUD'	https://www.bitchute.com/video/gKlswjEA5Flr/	1,366	4w
BitChute	THE MEL K SHOW	REBROADCAST OF AMAZING CYBER SYMPOSIUM OPENING VIDEO - THANK YOU MIKE AND ALL THE WARRIORS FOR TRUTH	https://www.bitchute.com/video/3Voc94LwSYqi/	29,422	4x
BitChute	Mike Lindell	MUST WATCH! CYBER SYMPOSIUM DAY 3, 1ST QUARTER HIGHLIGHTS	https://www.bitchute.com/video/Zb62EE9ryW8U/	1,223	4y
BitChute	Qanon	CYBER SYMPOSIUM: DAMNING VIDEO EXPLAINING HOW, WHY & WHO STOLE ELECTION	https://www.bitchute.com/video/3CPXALpIPdqH/	6,558	4z
BitChute	Qanon	CYBER SYMPOSIUM: DR. FRANK 'THE 2010 CENSUS WAS USED TO CREATE THE ALGORITHM TO STEAL ELECTION 2020'	https://www.bitchute.com/video/hXWZG7fLy8sv/	3,855	4aa
BitChute	Philosophers-stone.info pureblood	CYBER SYMPOSIUM, SIOUX FALLS, SD	https://www.bitchute.com/video/PenNLuGhwa8d/	5,965	4ab
Total				9,305,935	

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Media Appearances Video Views Investigation*Schedule 3d*

Views of Defamatory Media Appearances						
Date Posted	Website	Channel	Title	URL	Views	Source Document
War Room						
2/5/2021	Rumble	Bannons War Room	Ep 709: Moment of Clarity(w/ Ramaswamy, Beattie, Smith, Winters, Dr. Ming, Lindell)	https://rumble.com/vdllen-ep-709-moment-of-clarity-w-ramaswamy-beattie-smith-winters-dr.-ming-lindell.html	22,500	6a
2/6/2021	Rumble	Bannons War Room	Episode 712 - How to Win (w/ Dan Schultz, Mike J. Lindell)	https://rumble.com/vdmi63-episode-712-how-to-win-w-dan-schultz-mike-j.-lindell.html	88,000	6b
3/26/2021	Rumble	Bannons War Room	Episode 829 - Absolute Interference ... Mike Lindell Drops Bombshells on Stolen Election	https://rumble.com/vf2w7t-episode-829-absolute-interference-mike-lindell-drops-bombshells-on-stolen-e.html	82,100	6c
4/9/2021	Rumble	Bannons War Room	EP 862 - Let's Be Frank ... Mike Lindell's New Social Media Platform and New Lawsuit Against Dominion	https://rumble.com/vfisz1-ep-862-lets-be-frank-mike-lindells-new-social-media-platform-and-new-lawsui.html	47,600	6d
5/3/2021	Rumble	Bannons War Room	Episode 918 - Shut Up and Get Your Gene Therapy...NY Times and Fauci Move the Herd Immunity Goal Posts	https://rumble.com/vgg5up-episode-918-shut-up-and-get-your-gene-therapyny-times-and-fauci-move-the-he.html	21,100	6e
5/8/2021	Rumble	Bannons War Room	Episode 932 - Fauci's Fall Guy...Absolute Cover Up About Wuhan and Nov. 3	https://rumble.com/vgq285-episode-932-faucis-fall-guy-absolute-cover-up-about-wuhan-and-nov.-3.html	27,500	6f
OANN's Real America with Dan Ball Views						
2/8/2021	Rumble	One America News Network	Dan Ball - #GETREAL 'Mike Lindell Discusses "Absolute Proof"	https://rumble.com/vdo1t1-dan-ball-getreal-mike-lindell-discusses-absolute-proof.html	43,300	6g
OANN Special with Steve Bannon						
2/11/2021	Rumble	ElectionFraud2020Archives	Steve Bannon and Mike Lindell commentary on Absolute Proof	https://rumble.com/vdvqz3-steve-bannon-and-mike-lindell-commentary-on-absolute-proof.html	184	6h
3/23/2021	BitChute	Trump_Won_2020	A SCREENING AND CONVERSATION WITH MIKE LINDELL ABOUT ABSOLUTE PROOF WITH HOST STEVE BANNON ON 2.12.21	https://www.bitchute.com/video/B5ljFEZKJPZ0/	477	6i

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Media Appearances Video Views Investigation*Schedule 3d*

Views of Defamatory Media Appearances						
Date Posted	Website	Channel	Title	URL	Views	Source Document
"The Pete Santilli Show"						
2/24/2021	Rumble	The Pete Santilli Show	BREAKING: Mike Lindell Vows To Counter-Sue Dominion AND Sue Big Tech & Media	https://rumble.com/ve4l3x-breaking-mike-lindell-vows-to-counter-sue-dominion-and-sue-big-tech-and-med.html	218,000	6j
The "Eric Metaxas Radio Show"						
3/30/2021	Rumble	The Eric Metaxas Radio Show	Mike Lindell on His Election Investigation and FrankSpeech.com	https://rumble.com/vf77xd-mike-lindell-on-his-election-investigation-and-frankspeech.com.html	2,100,000	6k
4/5/2021	BitChute	Qanon	SCIENTIFIC PROOF	https://www.bitchute.com/video/uxvNNEslOuUW/	11,023	6l
"Indivisible" with John Stubbins						
4/1/2021	Facebook	Indivisible with John Stubbins	Will America have free & fair elections in the future??	https://www.facebook.com/IndivisibleWithJohnStubbins/videos/will-america-have-free-fair-elections-in-the-future/199185648249119	529	6m
4/1/2021	Rumble	IndivisibleEvents	Indivisible with John Stubbins interviews My Pillow's Mike Lindell	https://rumble.com/vjg91r-indivisible-with-john-stubbins-interviews-my-pillows-mike-lindell.html	343	6n
"USA Watchdog" with Greg Hunter						
4/8/2021	Rumble	Greg Hunter's USAWatchdog.com	Election Proof Puts Trump Back in Office - Mike Lindell	https://rumble.com/vfhsfz-election-fraud-proof-puts-trump-back-in-office-mike-lindell.html	143,000	6o
OANN's "Newsroom" with Pearson Sharp						
5/3/2021	Rumble	One America News Network	Mike Lindell Tackles Election Fraud	https://rumble.com/vgg9hh-mike-lindell-tackles-election-fraud.html	32,100	6p
Jimmy Kimmel Live!						
2/1/2023	Youtube	Jimmy Kimmel Live	MyPillow Mike Lindell's Interview from Inside a Claw Machine	https://www.youtube.com/watch?v=vGIDEbZvwLI	1,300,000	6q
2/2/2023	Youtube	Dr. Steve Turley	Jimmy Kimmel Tried to MOCK Mike Lindell, Then THIS Happened!!!	https://www.youtube.com/watch?v=2at-I_AtY6k	788,000	6r
Total					4,925,756	

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Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/tv/video/mike-lindell-presents-absolutely-9-0	Absolute 9-0	548,281	427,808
/tv/video/mike-lindell-and-his-cyber-symposium-attacked	Clip	427,030	289,029
/tv/video/scientific-proof-internationally-renowned-physicist-absolutely-proves-2020-election-was	Search Page	283,597	227,695
/tv/video/mike-lindell-releases-first-packet-captures-ahead-august-10-11-and-12-cyber-symposium-2	Search Page	135,012	116,405
/video/mike-lindell-presents-absolutely-9-0	Absolute 9-0	80,396	50,101
/video/scientific-proof-internationally-renowned-physicist-absolutely-proves-2020-election-was	Search Page	79,751	38,947
/tv/video/opening-cyber-symposium-august-12th-2021	Cyber Symposium	51,844	40,085
/tv/series/cyber-symposium-day-1	Search Page	49,379	23,187
/tv/video/mike-lindell-announces-location-upcoming-cyber-symposium	Clip	44,347	38,386
/tv/video/absolute-proof-exposing-election-fraud-and-theft-america-enemies-foreign-and-domestic	Absolute Proof	32,563	24,383
/video/mike-lindell-announces-details-upcoming-cyber-symposium-oan-0	Search Page	32,484	27,852
/tv/video/mike-lindell-releases-first-packet-captures-ahead-august-10-11-and-12-cyber-symposium-2.html	Search Page	31,772	25,649
/tv/video/mike-lindell-announces-court-victory-and-cyber-symposium	Clip	29,694	25,859
/tv/video/absolute-interference-sequel-absolute-proof-new-evidence-foreign-and-domestic-enemies-used	Absolute Interference	21,855	19,048
/tv/video/dr-frank-displays-his-evidence-day-1-cyber-symposium-0	Cyber Symposium	19,648	14,717
/tv/series/cyber-symposium-day-2	Search Page	14,563	8,057
/tv/video/mike-lindell-presents-absolutely-9-0.html	Search Page	13,538	10,813
/tv/video/cyber-symposium-bombshell-new-file-analyzed-live-b2t-show-aug-11-2021	Search Page	12,385	10,319
/tv/series/cyber-symposium-day-3	Search Page	11,805	8,003
/tv/video/mike-lindell-presents-absolutely-9-0?frank_pass=true	Absolute 9-0	11,308	10,295
/tv/video/son-brazils-president-eduardo-bolsonaro-speaks-day-1-cyber-symposium	Cyber Symposium	9,867	7,593
/video/absolute-interference-sequel-absolute-proof-new-evidence-foreign-and-domestic-enemies-used	Absolute Interference	9,762	5,662
/tv/video/captain-seth-keshel-presentation-day-2-cyber-symposium	Clip	8,998	8,005
/?destination=/tv/video/mike-lindell-presents-absolutely-9-0	Live Feed Page	5,704	3,457
/tv/video/cyber-symposium-day-1-opening-prayer-national-anthem-and-movie	Cyber Symposium	5,248	4,418
/tv/video/lindell-report-cyber-symposium-election-fraud-and-updates-social-media-side-frank	Clip	4,640	3,745
/tv/series/cyber-symposium-day-1?frank_pass=true	Search Page	4,380	4,171
/tv/video/cyber-symposium-day-2-opening-and-mock-election-presentation-patrick-colbeck	Clip	4,122	3,633
/tv/video/dr-frank-gives-inside-baseball-cyber-symposium	Clip	4,026	3,176
/tv/video/mike-lindell-and-his-cyber-symposium-attacked?frank_pass=true	Clip	3,146	2,247
/video/mike-lindell-shares-miraculous-results-his-cyber-symposium-media-not-talking-about	Clip	3,062	1,334
/video/mike-lindell-and-his-cyber-symposium-attacked	Clip	2,865	1,828
/?destination=/tv/video/mike-lindell-and-his-cyber-symposium-attacked	Live Feed Page	2,855	1,038
/video/dr-frank-displays-his-evidence-day-1-cyber-symposium-0	Cyber Symposium	2,838	1,226

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Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/video/opening-cyber-symposium-august-12th-2021	Cyber Symposium	2,663	1,633
/video/mike-lindell-releases-first-packet-captures-ahead-august-10-11-and-12-cyber-symposium	Clip	2,598	1,508
/tv/video/dr-franks-spirops-spiritual-battle-was-won-cyber-symposium	Clip	2,539	1,838
/video/three-ladies-inspired-mike-lindells-cyber-symposium-explain-how-they-are-using-surety-bonds	Clip	2,513	1,338
/tv/video/scientific-proof-internationally-renowned-physicist-absolutely-proves-2020-election-was?frank_pass=true	Search Page	1,727	1,552
/video/captain-seth-keshel-presentation-day-2-cyber-symposium	Clip	1,681	756
/video/mike-lindell-speaks-trump-rally-alabama-and-president-trump-praises-him-and-cyber-symposium	Clip	1,150	764
/video/mike-lindell-presents-absolutely-9-0?msclkid=2a7a22f81fb11c05bac343c4ff86c18c	Absolute 9-0	1,075	502
/video/mike-lindell-announces-location-upcoming-cyber-symposium	Clip	1,017	638
/video/cyber-symposium-day-2-opening-and-mock-election-presentation-patrick-colbeck	Clip	1,001	416
/tv/video/mike-lindell-announces-court-victory-and-cyber-symposium.html	Search Page	929	797
/tv/video/kurt-olson-mike-lindell-and-his-action-plan-and-cyber-symposium-fnale	Search Page	898	785
/user/login?destination=/video/scientific-proof-internationally-renowned-physicist-absolutely-proves-2020-election-was	Search Page	788	306
/?destination=/tv/series/cyber-symposium-day-1	Live Feed Page	771	367
/video/mike-lindell-announces-court-victory-and-cyber-symposium	Clip	688	460
/video/patrick-colbeck-presentation-day-1-cyber-symposium-0	Clip	551	238
/video/put-tsa-security-list-after-attending-mike-lindells-cyber-symposium	Clip	525	235
/video/cyber-symposium-day-1-opening-prayer-national-anthem-and-movie	Cyber Symposium	524	218
/tv/video/dr-frank-displays-his-evidence-day-1-cyber-symposium-0?frank_pass=true	Cyber Symposium	431	400
/video/mike-lindell-joins-brannon-howse-live-and-steve-bannons-warroom-huge-announcement-about-cyber	Search Page	413	228
/video/kurt-olson-mike-lindell-and-his-action-plan-and-cyber-symposium-fnale	Search Page	381	174
/video/mike-lindell-announces-details-upcoming-cyber-symposium-oan	Clip	377	225
/video/mike-lindell-presents-absolutely-9-0?frank_pass=true	Absolute 9-0	369	235
/video/mike-lindell-announces-details-upcoming-cyber-symposium-oan-0.html	Search Page	349	303
/tv/video/opening-cyber-symposium-august-12th-2021?frank_pass=true	Cyber Symposium	347	196
/tv/video/mike-lindell-presents-absolutely-9-0?view=mail	Absolute 9-0	338	286
/?destination=/tv/video/scientific-proof-internationally-renowned-physicist-absolutely-proves-2020-election-was	Live Feed Page	318	217

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Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/video/mike-lindell-presents-absolutely-9-0?__cf_chl_jschl_tk__=c2529798853a26356a41c0cb3d2247dadaa73155-1622759108-0-AU571uQ0CJwe6XIsCbtq0hF4BSQz_avKNsWMSjoRGKXBBpQ2BSe_ZzTtqL4B7X4ag1XBIXEWaV2qg3sZEaY0c6fTs uPFWk0cFfY66LRP1BkTrPhdzzCPmf-B6rNcqYUORV7hMudQkMJ2WS1B7UhGfUL5VZlu0VHJdP8IRIMDOGI7PAI8riRv3wMc CU8kSTLJXYOOC2nTS6JCF0EZKnz91PxmFWFWygLvqjxjrHeARtRSDFcYGGxUihevPzI_nQau8eANTK9-Zimi9RxnNgG47itp cHgL1J6BEQwY7ecPg2KWT0Z5F82X8b0ri3ZtNX5_k6lf9CLADijoTQJlWCXvi1-6d_7aTnjJl0TtS1XOpSG1bfXchiuE45K4M7Gk 33kg4V8XF0Sj1joG25x79Om2793ISeq0AgOP_FufUsv99LH_TbdCtJ0787sleZ3MBgC2YIRGCI_NtVwN-X2cxRvP0j8	Absolute 9-0	317	145
/video/dr-franks-spirops-spiritual-battle-was-won-cyber-symposium	Clip	277	131
/video/mike-lindell-presents-absolutely-9-0?msclkid=2cce9cffd21b1425b4adfdc4a75bbb93	Absolute 9-0	275	180
/tv/video/absolute-proof-exposing-election-fraud-and-theft-america-enemies-foreign-and-domestic.html	Search Page	247	224
/tv/video/mike-lindell-announces-location-upcoming-cyber-symposium.html	Search Page	246	212
/tv/video/scientific-proof-internationally-renowned-physicist-absolutely-proves-2020-election-was.html	Search Page	223	162
/tv/video/mike-lindell-releases-first-packet-captures-ahead-august-10-11-and-12-cyber-symposium-2?frank_pass=true	Search Page	204	186
/?destination=/tv/video/opening-cyber-symposium-august-12th-2021	Live Feed Page	202	38
/tv/video/absolute-interference-sequel-absolute-proof-new-evidence-foreign-and-domestic-enemies-used.html	Search Page	138	112
/tv/video/absolute-interference-sequel-absolute-proof-new-evidence-foreign-and-domestic-enemies-used?frank_pass=true	Absolute Interference	119	109
/tv/video/absolute-proof-exposing-election-fraud-and-theft-america-enemies-foreign-and-domestic?frank_pass=true	Absolute Proof	107	99
/video/mike-lindell-speaks-trump-rally-alabama-and-president-trump-praises-him-and-cyber-symposium?frank_pass=true	Clip	104	82
/tv/user/login?destination=/tv/video/absolute-proof-exposing-election-fraud-and-theft-america-enemies-foreign-and-domestic	Search Page	96	74
/?destination=/tv/video/cyber-symposium-day-1-opening-prayer-national-anthem-and-movie	Live Feed Page	90	77
/tv/video/dr-frank-gives-inside-baseball-cyber-symposium?frank_pass=true	Clip	89	87
/tv/video/son-brazils-president-eduardo-bolsonaro-speaks-day-1-cyber-symposium?frank_pass=true	Cyber Symposium	84	80
/tv/video/mike-lindell-announces-location-upcoming-cyber-symposium?fbclid=IwAR2jFm90wyLhZ8HT7gGyx0rii4AtC7o7c-66ffoM6_jYU-iBmj3xHH6HjKY	Clip	73	64

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Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/?destination=/tv/video/mike-lindell-releases-first-packet-captures-ahead-august-10-11-and-12-cyber-symposium-2	Live Feed Page	72	51
/user/register?destination=/video/scientific-proof-internationally-renowned-physicist-absolutely-proves-2020-election-was	Search Page	70	16
/?frank_pass=true&destination=/tv/video/mike-lindell-and-his-cyber-symposium-attacked	Live Feed Page	65	63
/video/scientific-proof-internationally-renowned-physicist-absolutely-proves-2020-election-was?trk_msg=1N986R155 SH4T84GNI2PTH94U4&trk_contact=HOVGC5B6ND806Q2M39TU2JLA0S&trk_sid=QKTQCTUUKB7LUHKJBHDS1D24 80&trk_link=BDJTG7RRE3IKR8LQ695BA3MDIO	Scientific Proof	64	27
/tv/video/mike-lindell-and-his-cyber-symposium-attacked? cf_chl_jschl_tk =pmd_0e7a5dad740a466d2e43f66c6f 49ea4eb58ca405-1628819314-0-gqNtZGzNAg2jcnBszQtO	Clip	62	23
/tv/video/captain-seth-keshel-presentation-day-2-cyber-symposium?frank_pass=true	Clip	62	61
/tv/video/absolute-proof-exposing-election-fraud-and-theft-america-enemies-foreign-and-domestic?trk_msg=BCDI6DOHJ294V1JE64NFFN25C0&trk_contact=TFK9AIIHHLU67EJO4JV10IKPVK&trk_sid=36T8QM HAU0LSA74J6IA877JL54 &trk_link=N4KFFV94G7C433SSJ17MEC69E8	Absolute Proof	60	26
/tv/video/mike-lindell-announces-location-upcoming-cyber-symposium?frank_pass=true	Clip	59	51
/video/scientific-proof-internationally-renowned-physicist-absolutely-proves-2020-election-was?trk_msg=8QROTMIL JMOK3EUR0DOQMBKVUG&trk_contact=SBA1JK97BLB92HFG2UTCNKO4A4&trk_sid=BV9QLE5CRU35MO0BBCNUKU N3DG&trk_link=FFIBSI013JS495372D9LKAPQH8	Scientific Proof	58	23
/user/login?destination=/tv/video/mike-lindell-announces-location-upcoming-cyber-symposium	Search Page	57	47
/video/scientific-proof-internationally-renowned-physicist-absolutely-proves-2020-election-was?trk_msg=8QROTMIL JMOK3EUR0D	Search Page	54	26
/tv/series/cyber-symposium-day-2?frank_pass=true	Search Page	53	50

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Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
http://tv/video/absolute-interference-sequel-absolute-proof-new-evidence-foreign-and-domestic-enemies-used?__cf_chl_jschl_tk__=3204ce2649b3aa42f068dfd99153b3aba07e13d4-1620930515-0-AX4eSFwJAWgxyPD6NVI0rqP2dkMKaHOilSSQ2BKrrb1dhqV_FGYnLI5-hivj44_RAmSM9-QuiuUGk5jscbgrmP6mc52WgSCdasNSpNgtMtikAxO7NCHUgr0up4flsPgX_lrXW_3luhV6hcBIIfTQ7IIVHkwdPYx17nVN3dGmr9ZaVHBvxfUOoE9Gxg812l1uigyKUjDpKgtGjA_IdRGBwP_T4XOq75E7rn_ue-cwSjNzsPEZKNTCtCAROQIqibNCBAXp1B9vvk619-TN0-N4vZZEFovp7l-dO42bB854Q9PzNqJ4WqIO5mJNn3U8Kdgm-cDYaLMQOd-OkAkIGxztgDwXv2ccUnOuhfB3u5dHYcJi96dfMN6j13MyQPOTxivxoKTVnKzV2TvRMGoC09wntISGh2L7V3bf9NOIXJWP2wt5INvMW7Bufy60y0gRiNOJZTjUkU1KqPL3cM54PddoN1rE85dP-d7gwnl-m46dcdQEY7z9JdAVdx9d-JHHfQlz7FvkHBy0f5q38LuUS28KnQ	Absolute Interference	49	49
/tv/series/cyber-symposium-day-3?frank_pass=true	Search Page	43	39
/tv/video/cyber-symposium-day-1-opening-prayer-national-anthem-and-movie?frank_pass=true	Cyber Symposium	43	40
/404.html?page=/tv/user/login?destination=/tv/video/absolute-proof-exposing-election-fraud-and-theft-america-enemies-foreign-and-domestic&from=https://frankspeech.com/tv/video/absolute-proof-exposing-election-fraud-and-theftamerica-enemies-foreign-and-domestic	Search Page	40	29
/?destination=/tv/video/absolute-proof-exposing-election-fraud-and-theft-america-enemies-foreign-and-domestic	Live Feed Page	40	31
/tv/video/mike-lindell-and-his-cyber-symposium-attacked?__cf_chl_jschl_tk__=pmd_957f05762d2371d67b617078ae835ccff8ace3cb-1628797071-0-gqNtZGzNag2jcnBszQj6	Clip	40	34
/video/mike-lindell-announces-details-upcoming-cyber-symposium-oan-0?frank_pass=true	Search Page	40	34
/tv/video/absolute-proof-exposing-election-fraud-and-theft-america-enemies-foreign-and-domestic?trk_msg=RLIJKPDDJGN4NDO5TP25VVR850&trk_contact=FKIU0TJSJ426ROKFDfRVJSTLJ4&trk_sid=CLFDP7LKK68G9E8SR5BN3BIO RS&trk_link=DKVRK96H4RR4P5POV12QPI55GO	Absolute Proof	38	9
/tv/video/mike-lindell-and-his-cyber-symposium-attacked?__cf_chl_jschl_tk__=pmd_bb2321560ac7488414a9282c95fac93a33a77370-1628802373-0-gqNtZGzNag2jcnBszQmO	Clip	38	19
/tv/video/mike-lindell-and-his-cyber-symposium-attacked?__cf_chl_jschl_tk__=pmd_adbdc2b0f27deda560087f290de8c1b2adf708dc-1628796693-0-gqNtZGzNag2jcnBszQmi	Clip	37	1
/user/login?destination=/video/put-tsa-security-list-after-attending-mike-lindells-cyber-symposium	Search Page	34	10
/?destination=/tv/video/absolute-interference-sequel-absolute-proof-new-evidence-foreign-and-domestic-enemies-used	Live Feed Page	34	27

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Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/404.html?page=/tv/video/mike-lindell-releases-first-packet-captures-ahead-august-10-11-and-12-cyber-symposium-2.html&from=	Search Page	34	33
/tv/video/mike-lindell-announces-court-victory-and-cyber-symposium?fbclid=IwAR2stq3yA0hfxS4KIw0_-7468hnXV51XJtsZtKgrrcEROucALzOtHxrKRm0	Clip	31	23
/tv/video/absolute-proof-exposing-election-fraud-and-theft-america-enemies-foreign-and-domestic?trk_msg=RLIJKPDDJGN4NDO5TP25VVR850&trk_contact=4UQ5K20IJGOB69NL43HU1JDT9G&trk_sid=DO1TU1JH7QEJUJ9O6LG849L GU0&trk_link=DKVRK96H4RR4P5POV12QPI55GO	Absolute Proof	30	11
/tv/video/mike-lindell-and-his-cyber-symposium-attacked?trk_msg=129IPK93UBUKFF2I7Q6NQIMB4G&trk_contact=S9IBQU1PJQ0FBNG0GHNN3RIMK8&trk_sid=UHA5AIABPHJL33NGMKRJ3KM7FO&trk_link=FCN5I5TG0GQ4D9LRGV LM67BMI8	Clip	28	15
/?destination=/tv/video/kurt-olson-mike-lindell-and-his-action-plan-and-cyber-symposium-fnale	Live Feed Page	28	17
/user/login?destination=/video/mike-lindell-shares-miraculous-results-his-cyber-symposium-media-not-talking-about	Search Page	26	5
/tv/series/cyber-symposium-day-1?trk_msg=C5LIG2UGHRF4DF2O8GFI7P2CUS&trk_contact=I3A0LIEKHUA1P082R5A2JUSAE0&trk_sid=SBPN7B5BCPBSMU4LQID0487GQ4&trk_link=G24R2GVRQUS4V9TIQ1J06L0KMO	Search Page	26	14
/video/mike-lindell-speaks-trump-rally-alabama-and-president-trump-praises-him-and-cyber-symposium?trk_contact=UM6EM3E1S1RR8C632EQL7GHBf4&trk_link=R8TFD38AVOF4J4C71L4LIE2BPS&trk_msg=T2RS2FGO4G6KFBSR5J8BUBQTNG&trk_sid=5GNF6B7ASS3LDH168TEP8OL220	Clip	26	24
/tv/video/absolute-proof-exposing-election-fraud-and-theft-america-enemies-foreign-and-domestic?trk_msg=RLIJKPDDJGN4NDO5TP25VVR850&trk_contact=NKKAN8FTJDRKUTPOKU32U4AUKS&trk_sid=VIBLSVDNKDCOJU07O2BQ2C6Q8G&trk_link=DKVRK96H4RR4P5POV12QPI55GO	Absolute Proof	25	12
/tv/series/cyber-symposium-day-1?trk_msg=5ITM786HJF9K3E79PL802A4T4O&trk_contact=S5KGIJ7QIMCRR2K0PTP6PBV5A0&trk_sid=BAM5AEV5KM8602TOHS3A91J7KC&trk_link=4ICNIPHNf6IKL55B800JELH65G	Search Page	24	23
/tv/video/mike-lindell-releases-first-packet-captures-ahead-august-10-11-and-12-cyber-symposium-2? cf_chl_jsc hl_tk =pmd_965ce6da137b689f5f4d1bd2eb8736dae7800cb2-1628814161-0-gqNtZGzNAk2jcnBszQoO	Search Page	24	23
/?destination=/tv/video/dr-frank-displays-his-evidence-day-1-cyber-symposium-0	Live Feed Page	23	14

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Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/tv/video/mike-lindell-releases-first-packet-captures-ahead-august-10-11-and-12-cyber-symposium-2.html?frank_pass=true	Search Page	23	15
/tv/series/cyber-symposium-day-1?trk_msg=Q6D74DQ4MSV4P9D66GBV2IG2LG&trk_contact=915KAGT5SRRDKP PD2KS567REBO&trk_sid=KR0E1OK2IR9199ANLA8TMU5O4O&trk_link=5FGGJUT7OSUK97NT3QCGN88RPS	Search Page	22	18
/tv/series/cyber-symposium-day-1?trk_msg=29IMS50RESDK73N6GSKIL8211G&trk_contact=ALTDQP0DLJQ3U8Q OD3OGEPVHIO&trk_sid=UF1RTBTL17HENQTH9GUAOGJ55C&trk_link=86TP7VGPFF94LCKACAHVIINEOG	Search Page	22	19
/video/mike-lindell-speaks-trump-rally-alabama-and-president-trump-praises-him-and-cyber-symposium?trk_contact=4GQDM12GUGS98UPVAI8UON20C&trk_link=C2J8LST8J8O412G9NULQN7UNTC&trk_msg=GJQBK3L00UT4L08EDVC 7ODDENO&trk_sid=EQQGN5H1LB02AI3F3GC7AQIECK	Clip	21	12
/?destination=/tv/series/cyber-symposium-day-2	Live Feed Page	21	19
/tv/series/cyber-symposium-day-1?trk_msg=LT6BC5LEEQU471B5P42TNUFSF4&trk_contact=3I7496KB4E0U7PG7 DV8F8NJJH24&trk_sid=SVPOMLHJJC2QGC7C9NMKE9FGO&trk_link=NE9T00RHEIOKT3P46K56B91AL0	Search Page	20	2
/user/login?destination=/video/absolute-interference-sequel-absolute-proof-new-evidence-foreign-and-domestic-enemies-used	Search Page	20	9
/video/absolute-interference-sequel-absolute-proof-new-evidence-foreign-and-domestic-enemies-used?frank_pass=true	Absolute Interference	20	18
/tv/video/dr-franks-spirops-spiritual-battle-was-won-cyber-symposium?frank_pass=true	Clip	20	19
/tv/video/dr-frank-displays-his-evidence-day-1-cyber-symposium-0?fbclid=IwAR2tzUbOzHGqZAvy65TbdJLHV m1Psdw7yz7YHZWqyjUN7gkVwxcq1u6jGYU	Cyber Symposium	19	16
/tv/series/cyber-symposium-day-1?trk_msg=C5LIG2UGHRF4DF2O8GFI7P2CUS&trk_contact=A0K27S3ORPU9PCQ P81UJ3PS0MK&trk_sid=S9VIS23M3TGLMEHAPRMPJRVLD4&trk_link=G24R2GVRQUS4V9TIQ1J06L0KMO	Search Page	18	3
/tv/series/cyber-symposium-day-1?trk_msg=2LOKKF4GPOTKT7A0O8D7LOCEH4&trk_contact=O3QQHO39GO0OB 3ADSC69GI4VOO&trk_sid=F9MJRMA0M1EUHS3P8H8P1D5N80&trk_link=JQTPN41SMD94JEEER1O5626AUQG	Search Page	17	12
/tv/video/mike-lindell-announces-court-victory-and-cyber-symposium?fbclid=IwAR2CumtXHUxENF_8-1vGs2qHyI Nc81aM0bHn1UXotwVO4CYk_ebjSVuQCeQ	Clip	17	16
/video/absolute-interference-sequel-absolute-proof-new-evidence-foreign-and-domestic-enemies-used?fbclid=IwAR1Ax9j lGlgjk2q7R9yiloXj7bdALcCYM9maoVtyDQK9GisgJt0y8U12luM	Absolute Interference	16	1

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Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/tv/video/mike-lindell-announces-location-upcoming-cyber-symposium?fbclid=IwAR3jzqA8xH_K9co6ZRArogaW TcteJtmnhqNfVSMOh3hwSuSNsk9Cx4jQU44	Clip	16	3
/video/three-ladies-inspired-mike-lindells-cyber-symposium-explain-how-they-are-using-surety- bonds?trk_contact=PG190V796CD4JQ27AMJH28M3TG&trk_link=64FDR8NVS87450T116PR3E3NQS&trk_msg=MEDA 5K2BHKHPFEUKJ ADN8J2J8&trk_sid=26455TM1LQ4KKURG9KKLGPU3P0	Clip	16	10
/user/login?destination=/video/mike-lindell-announces-details-upcoming-cyber-symposium-oan	Search Page	14	3
/tv/video/opening-cyber-symposium-august-12th-2021? cf_chl_jschl_tk =pmd_f76e6401b7b0032b410dfd13 767e5e2a5d98c741-1628807945-0-gqNtZGzNAg2jcnBszQni	Cyber Symposium	14	3
/user/login?destination=/video/dr-frank-displays-his-evidence-day-1-cyber-symposium-0	Search Page	14	6
/video/three-ladies-inspired-mike-lindells-cyber-symposium-explain-how-they-are-using-surety- bonds?trk_contact=7NMAM1AN29DQ9FJNLCJSQH4IV8&trk_link=AQSICUJPJO3KV2B5IQ54KOJ3NG&trk_msg=3N7SD KF0IBS49D8T6HVA 77UTM4&trk_sid=4092VI294U32SNSPS8L4855LHC	Clip	13	6
/video/three-ladies-inspired-mike-lindells-cyber-symposium-explain-how-they-are-using-surety- bonds?trk_contact=IM99VPR3OS1EFTLCE26VRA9L4&trk_link=OIHQ423PITDKD906TS4QKP3M78&trk_msg=V8A8VN PIUDMKL9374TS6 D1JESC&trk_sid=PS6UKP2EIQB2VII3H9CAGDELOO	Clip	13	6
/tv/video/mike-lindell-announces-location-upcoming-cyber-symposium?fbclid=IwAR3psxKBJ9xz_eVz1XZsu00s_ 1b7HoJEzG9O16Alj8_96lCdVMZi933M26A	Clip	13	11
/tv/video/mike-lindell-announces-location-upcoming-cyber-symposium? cf_chl_jschl_tk =pmd_c56766e189bb 4fc5381b2866d7b305526bf71929-1628795363-0-gqNtZGzNAiKjcnBszQi6	Clip	13	12
/tv/video/absolute-interference-sequel-absolute-proof-new-evidence-foreign-and-domestic-enemies- used?__cf_chl_jschl_tk__=e94e298eb063cbf64f9d38fcc1c27a159c808d6f-1622229115-0-AR- BLXpUtSZ2CFLU9z3wnbHtx82tvZysunklGVu4iHYt2r_ZnMahrGgMmEpd__Oh1XiKnXINH13cMhELrzzkcaBkk- DiQ3Eb1K0A_DEOZdskwWhjDMgfwjrjev3LP5X6KCIQVplIVzt8k3NkIGcOUj- 7frxjsxj6xAN2oe6XNyHlVrCzdySvoBBqhsV_JFokUH8Xjdvr9wvxTR1zs4AywUe3ZwflFk8wS1FTkk74frDfa12kZ41L8sedl 1EH4- 6wQuMbxcynX9sr7W5zR5dk2o6DGiacPbtC2gzJ_bmKST4Yg0sg53s6ygNGk5JkedFWNmQM3nLDYtsRcNF2E_WJoPiy95 QL7r2Ln6WguBUhcZrvXihNh3w_30hqIsPwxXMD7T92NU6zWklrZzcM2tXDhZ9M5x_gByh26MtPUXB_9fnWWEcOAsz6 M3kdIhtLESXsZjL22uVz5rAvb2fiNXP9N1_dvOrPE0efKon5_DsHJTW_BKWh_Sro86g47f56bP- WPmfaBty51Zmq4H1PDLqs	Absolute Interference	13	13
/video/dr-frank-displays-his-evidence-day-1-cyber-symposium-0?frank_pass=true	Cyber Symposium	12	5
?frank_pass=truehttps://home.frankspeech.com/tv/video/mike-lindell-announces-location-upcoming-cyber-symposium	Live Feed Page	12	10

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Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/tv/video/mike-lindell-releases-first-packet-captures-ahead-august-10-11-and-12-cyber-symposium-2.html? cf_c hl_jschl_tk =pmd_4b5654c0f1a41f3345e70594da29795bc32841fe-1628807983-0-gqNtZGzNAk2jcnBszQmO	Search Page	12	11
/video/mike-lindell-speaks-trump-rally-alabama-and-president-trump-praises-him-and-cyber-symposium?trk_contact=TIV25M9U70UD4SLCQH98AS7760&trk_link=OGU71T3KA6A4V0F2VSKV9JVNL8&trk_msg=43RTPVPT19TKLBO4H6638L7JHK&trk_sid=25E653P319PJ28ERA20VNR40	Clip	11	8
/tv/video/opening-cyber-symposium-august-12th-2021? cf_chl_jschl_tk =pmd_aa022ed148b25ff8a25f09997921e69bc3fab547-1628821391-0-gqNtZGzNag2jcnBszQmi	Cyber Symposium	11	9
/user/login?destination=/video/opening-cyber-symposium-august-12th-2021	Search Page	10	3
/video/mike-lindell-speaks-trump-rally-alabama-and-president-trump-praises-him-and-cyber-symposium?trk_contact=287MMMT24GV077CNHTAPSKHSG&trk_link=GK18QJ2N9TG4B1FKFHF8842U84&trk_msg=29IMS50RESDK73N6GS KIL8211G&trk_sid=FPFR5B93T1QG3VUTJ2MGJ6OGKG	Clip	10	5
/video/mike-lindell-speaks-trump-rally-alabama-and-president-trump-praises-him-and-cyber-symposium?trk_contact=QLD7N5FVP154FRLVDUODRQ2MFO&trk_link=KKSJUCUFLN41E2GGJVNHLQ5O8&trk_msg=4KPP2VH1SG747DR3AIHOT378H4&trk_sid=NB59DC9GRCJ69T58MH6807UPD0	Clip	10	6
/video/three-ladies-inspired-mike-lindells-cyber-symposium-explain-how-they-are-using-surety-bonds?trk_contact=UOOHT8N6HAJCAHG7J86PLHUIUC&trk_link=AA005E33PDC4H996LT4J1K8DS0&trk_msg=KU989F55267416A11QP6N TQTAS&trk_sid=DKCMP67IPDS251BKVTVLG1A0OK	Clip	10	6
/tv/video/opening-cyber-symposium-august-12th-2021? cf_chl_jschl_tk =pmd_18ede8882251b597d7d305f5ca0b174eb42b6263-1628812596-0-gqNtZGzNag2jcnBszQvO	Cyber Symposium	10	9
/404.html?page=/tv/download/MTY1MDY=&from=https://frankspeech.com/tv/video/son-brazils-president-eduardo-bolsonaro-speaks-day-1-cyber-symposium	Search Page	9	5
/video/three-ladies-inspired-mike-lindells-cyber-symposium-explain-how-they-are-using-surety-bonds?trk_contact=LDAFUE6K5BH2E23J2SELGTLB3C&trk_link=VDJABP6GD5N432D31TO067R3VO&trk_msg=28AGVV MKG4B4T9MK3F7 V5U1IH8&trk_sid=FNQEOR4T23LPSPGLJT270IFCLO	Clip	9	5
?/destination=/video/mike-lindell-announces-details-upcoming-cyber-symposium-oan-0	Live Feed Page	9	8
/tv/video/cyber-symposium-day-2-opening-and-mock-election-presentation-patrick-colbeck?frank_pass=true	Clip	9	9

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Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/video/mike-lindell-announces-details-upcoming-cyber-symposium-oan-0?fbclid=IwAR3nGIAbI6PBT1QOEEdGv mhimu7G0i1R5JeOMGSO_rr-4EZZfUWQm0rzbGQo	Search Page	9	9
/user/register?destination=/video/opening-cyber-symposium-august-12th-2021	Search Page	8	1
/user/register?destination=/video/put-tsa-security-list-after-attending-mike-lindells-cyber-symposium	Search Page	8	1
/user/login?destination=/video/captain-seth-keshel-presentation-day-2-cyber-symposium	Search Page	8	4
/video/three-ladies-inspired-mike-lindells-cyber-symposium-explain-how-they-are-using-surety- bonds?fbclid=IwAR2U 9-OeexBkmG54q9zPHDiw89ZSGZZYIbkeJ0JtenSVaTfqUizK2ntRbm4	Clip	8	4
/video/three-ladies-inspired-mike-lindells-cyber-symposium-explain-how-they-are-using-surety- bonds?trk_contact=F7M39NPPQ3U4OKFIFVS6725C40&trk_link=OIHQ423PITDKD906TS4QKP3M78&trk_msg=V8A8V NPIUDMKL9374TS6 D1JESC&trk_sid=Q9DLQJNHOR2E80GRCUSHI90BLO	Clip	8	5
/video/three-ladies-inspired-mike-lindells-cyber-symposium-explain-how-they-are-using-surety- bonds?trk_contact=M249L6QMQTBA7A78DN2CBREPO&trk_link=VDJABP6GD5N432D31TO067R3VO&trk_msg=28A GVVMKG4B4T9MK3 F7V5U1IH8&trk_sid=PQC428MOGRSGPCPEIL7972N1KC	Clip	8	5
/tv/video/cyber-symposium-bombshell-new-file-analyzed-live-b2t-show-aug-11-2021?frank_pass=true	Search Page	8	8
/tv/video/mike-lindell-releases-first-packet-captures-ahead-august-10-11-and-12-cyber-symposium-2? cf_chl_jsc hl_tk =pmd_d0d0035d7dfe1680b20adcbcd08eaacef32980c2-1628820798-0-gqNtZGzNAk2jcnBszQi6	Search Page	8	8
/tv/video/opening-cyber-symposium-august-12th-2021? cf_chl_jschl_tk =pmd_606f3c725d7385e12397d8cc e0b1f04229e45cab-1628801523-0-gqNtZGzNAG2jcnBszQgi	Cyber Symposium	8	8
/403.html?page=/video/put-tsa-security-list-after-attending-mike-lindells-cyber-symposium&from=https://franksp eech.com/lindell-report	Search Page	7	2
/403.html?page=/video/put-tsa-security-list-after-attending-mike-lindells-cyber-symposium&from=https://franksp eech.com/shows/lindell-report	Search Page	7	2
/tv/video/dr-frank-displays-his-evidence-day-1-cyber-symposium-0?fbclid=IwAR0hQuha2z3kzQDMbvXGY8Bg_ 8PuRbj8g0XWe0x3WNsO6DUuJVNwpTc27YM	Cyber Symposium	7	5
/video/three-ladies-inspired-mike-lindells-cyber-symposium-explain-how-they-are-using-surety- bonds?trk_contact=DFTKHV5GS6U01TDSQ9IV9OT4AO&trk_link=AQSICUJPJO3KV2B5IQ54KOJ3NG&trk_msg=3N7SDK FOIBS49D8T6HVA 77UTM4&trk_sid=7RIO9C4L8TIHC12PH4M9FKL6KS	Clip	7	6
/user/login?destination=/video/mike-lindell-joins-brannon-howse-live-and-steve-bannons-warroom-huge-an nouncement-about-cyber	Search Page	6	1
/user/register?destination=/video/mike-lindell-shares-miraculous-results-his-cyber-symposium-media-not-talkin g- about	Search Page	6	2
/?destination=/tv/video/dr-frank-gives-inside-baseball-cyber-symposium	Live Feed Page	6	3

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Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/tv/video/dr-frank-displays-his-evidence-day-1-cyber-symposium-0?fbclid=IwAR1RR729876b-Kysdr-f6KmGc7UUeCJhHY7-fDHgPRR2xwQJ_VaFiKDYX4c	Cyber Symposium	5	4
/tv/video/mike-lindell-announces-court-victory-and-cyber-symposium?fbclid=IwAR0KKPQfdD7MYVvolRlyMbUNL4dmoQ2aNBaxq698HCpjKPOJ533eCsIE9u8	Clip	5	4
/tv/video/mike-lindell-announces-court-victory-and-cyber-symposium?frank_pass=true	Clip	5	4
/?destination=/tv/video/captain-seth-keshel-presentation-day-2-cyber-symposium	Live Feed Page	5	5
/tv/video/mike-lindell-announces-court-victory-and-cyber-symposium? cf_chl_jschl_tk =pmd_62bd1fe58e10b7fde0bde95ede6d664aff7159f6-1628796908-0-gqNtZGzNAiKjcnBsZQx6	Clip	4	1
/tv/video/mike-lindell-announces-court-victory-and-cyber-symposium?fbclid=IwAR1OPcm8YGScov7avQ1cET1xUHWm_fIth9-mdKIRNyB7vnd_nuZN1iAvYNk	Clip	4	1
/video/mike-lindell-speaks-trump-rally-alabama-and-president-trump-praises-him-and-cyber-symposium?trk_contact=MITTAP1N9EN19UD0DHALJO493S&trk_link=VA9RADIBQ57K76LFIJTVB5KGM0&trk_msg=AHSVK90OVSDKF48ADPHN7BK87S&trk_sid=1CR96E8HN838VJMHKL2IPH7OCO	Clip	4	1
/tv/video/lindell-report-cyber-symposium-election-fraud-and-updates-social-media-side-frank?fbclid=IwAR2f1zaTqx9 iVSoTZKnKXlyw0xAzbJvKbIQk0rf_Sn0xQ9U2o8LWNcq1_qg	Clip	4	1
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/?frank_pass=true&destination=/tv/video/dr-frank-displays-his-evidence-day-1-cyber-symposium-0	Live Feed Page	4	4
/video/mike-lindell-announces-details-upcoming-cyber-symposium-oan-0?fbclid=IwAR0nRCOAjytKIwcx8bl41lbfq_c5lf6JYAzpn7oYR73ibEgkFaDFI454JyY	Search Page	4	4
/video/mike-lindell-announces-details-upcoming-cyber-symposium-oan-0?fbclid=IwAR0XCDI4F8TQsOpKYpvFN8AbvNBvOYbywol4sLx8JyaDZZTWM0xiUVxxnKE	Search Page	4	4
/video/mike-lindell-announces-details-upcoming-cyber-symposium-oan-0?fbclid=IwAR1acfmDRTmuxtPUPfZySUMPHLruOWL55zlp4Sa8--xDM29Yn5gL5EGy5yg	Search Page	4	4
/video/mike-lindell-speaks-trump-rally-alabama-and-president-trump-praises-him-and-cyber-symposium?trk_contact=G14D9MPAVS11P2N4J8O02276TO&trk_link=1MMHFF22ME643D69860RUAAL8G&trk_msg=C5LIG2UGHRF4DF2O8GF17P2CUS&trk_sid=JDHFH05013GV5436EN4MIKN9RO	Clip	4	4

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Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/tv/video/cyber-symposium-bombshell-new-file-analyzed-live-b2t-show-aug-11-2021? cf_chl_jschl_tk =pmd_087ae7217dd2e0ab7764afc951905ca15549627f-1628805056-0-gqNtZGzNAjijcnBszQlO	Search Page	3	2
/user/login?destination=/video/cyber-symposium-day-1-opening-prayer-national-anthem-and-movie	Search Page	3	2
/tv/video/mike-lindell-announces-court-victory-and-cyber-symposium?fbclid=IwAR2bbkwvWV4T_wTIncZajYxSeDy2QvhogKz8ri9gbVOYGjU8txDhPVynJ_w	Clip	3	2
/tv/video/captain-seth-keshel-presentation-day-2-cyber-symposium?fbclid=IwAR08w3HRfCHyeuvOBM0talpjOi eSPZvFnp3WCWbQ-9QfmAmOR_Z6OdztzY	Clip	3	3
/404.html?page=/tv/user/login?destination=/tv/video/dr-frank-gives-inside-baseball-cyber-symposium&from=htps://frankspeech.com/tv/video/dr-frank-gives-inside-baseball-cyber-symposium	Clip	3	3
/tv/user/login?destination=/tv/video/dr-frank-gives-inside-baseball-cyber-symposium	Search Page	3	3
/tv/user/login?destination=/tv/video/lindell-report-cyber-symposium-election-fraud-and-updates-social-media-side-fr ank	Search Page	3	3
/tv/video/lindell-report-cyber-symposium-election-fraud-and-updates-social-media-side-frank?frank_pass=true	Clip	3	3
/404.html?page=/video/captain-seth-keshel-presentation-day-2-cyber-symposium&from=	Search Page	2	1
/video/captain-seth-keshel-presentation-day-2-cyber-symposium?fbclid=IwAR03Qx5xK_CeZk4LTvaiW2U8b DEBpgrTS4-Sd2CEPsc501RuJ6S2tBSuSs	Clip	2	1
/video/captain-seth-keshel-presentation-day-2-cyber-symposium?fbclid=IwAR05f8-7nSST1XToJIN_PcJJNfx XL8CwZLXvQ-yP_Mb5xR0tCDB7biLdnw	Clip	2	1
/video/captain-seth-keshel-presentation-day-2-cyber-symposium?fbclid=IwAR07AdYmQdOTYWUG-UnWJoW-gjKrbqHWeRF40pO30-G6CwiET5FyiJNoVhw	Clip	2	1
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/tv/video/cyber-symposium-bombshell-new-file-analyzed-live-b2t-show-aug-11-2021? cf_chl_jschl_tk =pmd_a384a02748404896d7c61450ae202f595eb52e40-1628795985 0-gqNtZGzNArjcnBszQl6	Search Page	2	1
/tv/video/cyber-symposium-bombshell-new-file-analyzed-live-b2t-show-aug-11-2021? cf_chl_jschl_tk =pmd_a6c1b6ace36ef7ab9f50d64a0c634d71cef0d5fa-1628780942-0-gqNtZGzNAjijcnBszQki	Search Page	2	1
/tv/video/cyber-symposium-day-1-opening-prayer-national-anthem-and-movie?fbclid=IwAR1CrHbDLbllaob0KB-scCvI SHDknHW9UWnVn-ivRiVKF9dSSDeibbmBHcA	Cyber Symposium	2	1
/user/login?destination=/video/cyber-symposium-day-2-opening-and-mock-election-presentation-patrick-colbec k	Search Page	2	1

Nevium Intellectual Property Consultants

Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/video/cyber-symposium-day-2-opening-and-mock-election-presentation-patrick-colbeck?fbclid=IwAR1AJYfsBLyKb5LM30LKzZAFzmHbAfmnmUMycfHcA8z4Jh1idejALQqeumw	Clip	2	1
/video/cyber-symposium-day-2-opening-and-mock-election-presentation-patrick-colbeck?fbclid=IwAR1LYYRTG SerU-2vUcLEDfdP4ccy7KaqHthLhIQYn_T4cHyZ5FEvMnflsMk	Clip	2	1
/video/cyber-symposium-day-2-opening-and-mock-election-presentation-patrick-colbeck?fbclid=IwAR3_3TSZ6WujivEV2fxKtgKNz6RsLY3sQvsVVVFc_EAfKPS3cG-or5MPIG0	Clip	2	1
/?destination=/tv/series/cyber-symposium-day-3	Live Feed Page	2	1
/tv/video/dr-frank-gives-inside-baseball-cyber-symposium?fbclid=IwAR0dD7SvUzaYpvSU4SJrd47LUNHRibFDtxHUm6fQxbwg_97ktMFI4X_PicI	Clip	2	1
/tv/video/kurt-olson-mike-lindell-and-his-action-plan-and-cyber-symposium-fnale?fbclid=IwAR1gft5dl8FRBySd Qs4-O-HhQ5MnvxvCw-f-Dwn_JWX2ex8PckseNwXFBnU	Search Page	2	1
/tv/video/kurt-olson-mike-lindell-and-his-action-plan-and-cyber-symposium-fnale?frank_pass=true	Search Page	2	1
/user/login?destination=/video/kurt-olson-mike-lindell-and-his-action-plan-and-cyber-symposium-fnale	Search Page	2	1
/video/mike-lindell-shares-miraculous-results-his-cyber-symposium-media-not-talking-about?fbclid=IwAR2q0IQW2DDmfjlveZ2LFu2tvY4eFUGf4C2D2PM4_ydNC-HXxGa6_9EQBs	Clip	2	1
/video/mike-lindell-shares-miraculous-results-his-cyber-symposium-media-not-talking-about?fbclid=IwAR2QiF5FYV1rJLZCsdFkTUuPJ_tsAMFDvBG8eLPMGHhpOze6Q38zWG9NzY	Clip	2	1
/video/mike-lindell-shares-miraculous-results-his-cyber-symposium-media-not-talking-about?fbclid=IwAR2ze9zCdQ94EZRKCmxsg2BLkMkwSwKz6CuTkSJEE3z-XDwx8bHGMYYAAqXQ	Clip	2	1
/video/mike-lindell-shares-miraculous-results-his-cyber-symposium-media-not-talking-about?fbclid=IwAR3Ugv-qcfQUjXNXMRljyp2CGjybUprhI3sCA2iUnAvoLZ7BVd0WzczfLI	Clip	2	1
/user/login?destination=/video/patrick-colbeck-presentation-day-1-cyber-symposium-0	Search Page	2	1
/?destination=/tv/video/son-brazils-president-eduardo-bolsonaro-speaks-day-1-cyber-symposium	Live Feed Page	2	1
/404.html?page=/tv/user/login?destination=&from=https://frankspeech.com/tv/video/son-brazils-president-eduardo-bolsonaro-speaks-day-1-cyber-symposium	Search Page	2	1
/tv/video/son-brazils-president-eduardo-bolsonaro-speaks-day-1-cyber-symposium?fbclid=IwAR19DvocEINIYK9bWeu6-LB1x7X5nZlpxYbPI1SRqGrnAw_GRUQuX5iGRU	Cyber Symposium	2	1
/tv/video/son-brazils-president-eduardo-bolsonaro-speaks-day-1-cyber-symposium?fbclid=IwAR1lbEym7J8pQPPI3KGBbONe5gFb4IHVuwMkn5sAQdvnMTjgTW1w8r1P8dg	Cyber Symposium	2	1
/tv/video/son-brazils-president-eduardo-bolsonaro-speaks-day-1-cyber-symposium?fbclid=IwAR1tOLeVVMHgs6rdC6F5F93zvG3mHoRrigh8NH7nWCut7onitYk0ECnXZrA	Cyber Symposium	2	1
/tv/video/lindell-report-cyber-symposium-election-fraud-and-updates-social-media-side-frank?fbclid=IwAR0FeSHpIAbyUUt8ndPjge74Rc2NETpo2C-W5Uckp6VYDghf1qAyE4AJiU	Clip	2	1
/tv/video/lindell-report-cyber-symposium-election-fraud-and-updates-social-media-side-frank?fbclid=IwAR0FzWJo1R_793H9rfRiVbpOPjODA3YTfhQ9UYaNmtSoloux5GwndedUvxM	Clip	2	1

Nevium Intellectual Property Consultants

Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/tv/video/lindell-report-cyber-symposium-election-fraud-and-updates-social-media-side-frank?fbclid=IwAR0G8Twns1GNUdtS60SYpVNvln7nqnfEUTPvm4INPACwzlxTWby1Ng3TVQ	Clip	2	1
/tv/video/lindell-report-cyber-symposium-election-fraud-and-updates-social-media-side-frank?fbclid=IwAR0k9wm3U 3Gn3clWcCvzmFqcrRqDsmXmMVbEj2EH0uAD8bvPEgMdH8Ktziw	Clip	2	1
/tv/video/lindell-report-cyber-symposium-election-fraud-and-updates-social-media-side-frank?fbclid=IwAR0NFne9pHBB7Lx1TYslxW_5iu0G4upzXyFvbKswvA9me9470jOaihyANOY	Clip	2	1
/video/cyber-symposium-day-2-opening-and-mock-election-presentation-patrick-colbeck?fbclid=IwAR2O-GFh7N4R6DfoOrfQ8V-6lmF5keA_aJs6kihjho1m3LUzj-JukTsS0_g	Clip	2	1
/video/cyber-symposium-day-2-opening-and-mock-election-presentation-patrick-colbeck?fbclid=IwAR3_GN-iQ18hBJdEXsVAXoyzAra3LbBVzYRgUpN9bRiqbgk2ddj-c_F7_MI	Clip	2	1
/tv/video/cyber-symposium-bombshell-new-file-analyzed-live-b2t-show-aug-11-2021? cf_chl_jschl_tk =pmd_6f37048f4932bf0bb4add3ee79092bd1638b1e4c-1628793062-0-gqNtZGzNAjjcnBszQtO	Search Page	2	2
/tv/video/cyber-symposium-bombshell-new-file-analyzed-live-b2t-show-aug-11-2021? cf_chl_jschl_tk =pmd_a5ac2b7f7ed03009d5e381768567f9270cb05327-1628789776 0-gqNtZGzNAjjcnBszQf6	Search Page	2	2
/?destination=/tv/video/cyber-symposium-day-2-opening-and-mock-election-presentation-patrick-colbeck	Live Feed Page	2	2
/404.html?page=/tv/download/MTY2Njl=&from=https://frankspeech.com/tv/video/dr-frank-gives-inside-baseball-cyber-symposium	Search Page	2	2
/?frank_pass=true&destination=/tv/video/son-brazils-president-eduardo-bolsonaro-speaks-day-1-cyber-symposium	Live Feed Page	2	2
/tv/video/son-brazils-president-eduardo-bolsonaro-speaks-day-1-cyber-symposium?fbclid=IwAR0Gd6Fx-zypKvd96ZdSISuwLcJ_UqIDfzUp6h2Xtxi8MYb6zGGvsSLBFvw	Cyber Symposium	2	2

Nevium Intellectual Property Consultants

Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/404.html?page=/tv/user/login?destination=/tv/video/lindell-report-cyber-symposium-election-fraud-and-updates-soc-ial-media-side-frank&from=https://frankspeech.com/tv/video/lindell-report-cyber-symposium-election-fraud-and-updates-social-media-side-frank	Search Page	2	2
/frank_pass=true&destination=/tv/video/cyber-symposium-bombshell-new-file-analyzed-live-b2t-show-aug-11-2021	Live Feed Page	1	1
/tv/video/cyber-symposium-bombshell-new-file-analyzed-live-b2t-show-aug-11-2021?cf_chl_jschl_tk=pmd_00c112ad50dd2575be82351ef6c876d02b841eaa-1628793468-0-gqNtZGzNAjjcnBsZQji	Search Page	1	1
/frank_pass=true&destination=/tv/video/cyber-symposium-day-1-opening-prayer-national-anthem-and-movie	Live Feed Page	1	1
/tv/video/cyber-symposium-day-1-opening-prayer-national-anthem-and-movie?__FB_PRIVATE_TRACKING__={"logged_out_browser_id":"53f145efc6bd6f1a8168f5fa3a3e6ff9da6f3d2b"}&fbclid=IwAR3foXPYGUhj2CNZbzOLFDTN9H1eE MAj10xUorQxJixTQk0_-PFiYbZNBz4	Cyber Symposium	1	1
/tv/video/cyber-symposium-day-1-opening-prayer-national-anthem-and-movie?fbclid=IwAR0CHQ68al2zaBTDYPcB1O8qaCQi4UUs2Ff4jQZp6ymRXMQeAtdxAlie4LY	Cyber Symposium	1	1
/tv/video/cyber-symposium-day-1-opening-prayer-national-anthem-and-movie?fbclid=IwAR0XccfMGGMdRvdYtA3W2Sa7wqagDKXDYhQSL_CVU3xoebsJ6d7r-ejW_w	Cyber Symposium	1	1
/tv/series/cyber-symposium-day-2?fbclid=IwAR29wg9Fb2yip5LdHhZC-gDQdBvN6cO_SliWEWRjJ3RhAnCXtSRdzEqBXco	Search Page	1	1
/tv/series/cyber-symposium-day-2?fbclid=IwAR3lcd5MCQk7rCM1kTelj8vGhAXiqcQWUf2Oc84EUftJ1SeAGACKsrQI4E0	Search Page	1	1
/tv/series/cyber-symposium-day-3?fbclid=IwAR3dr_qH5Awh_0GEQwDuyQccA--XsucY8hG-wcnV0rbthj-9HUea_R0jswA	Search Page	1	1
/tv/video/dr-frank-gives-inside-baseball-cyber-symposium?fbclid=IwAR10LBHqegQ6NzPCfagLezEyyZNSXcbPUqXgDxiZai2BzH_5JAXugbegdcs	Clip	1	1
/user/login?destination=/tv/video/dr-frank-gives-inside-baseball-cyber-symposium	Search Page	1	1
/tv/video/kurt-olson-mike-lindell-and-his-action-plan-and-cyber-symposium-fnale?fbclid=IwAR13PDg9-IU87CJvTn_6ucgar8BndaGAb7PTzmFVmSrWizTueNq9s6GMNV8	Search Page	1	1
/tv/video/dr-franks-spirops-spiritual-battle-was-won-cyber-symposium?fbclid=IwAR12x3hwaG5wk38I7Pv45AgZKW01_jQP68SwGGmKfrM4nCVWSEyZ_-stlal	Clip	1	1
/tv/video/dr-franks-spirops-spiritual-battle-was-won-cyber-symposium?fbclid=IwAR1KWWZBXcQMNPn-X5j4TCmGFYwJgsbjV0vLQ-FsYlQNRfVSP0caUJRSseo	Clip	1	1

Nevium Intellectual Property Consultants

Frankspeech Video Views Investigation*Schedule 3e*

Source: Documents 9a and 9b, Frankspeech Google Analytics

Frankspeech Pageview Data Related to the Cyber Symposium and Absolute Documentary Series			
Page	Web Page Type	Pageviews	Unique Pageviews
/tv/video/kurt-olson-mike-lindell-and-his-action-plan-and-cyber-symposium-fnale?fbclid=IwAR18nsNUZxcqXZwbqfINpDUOM720zIjb0m-aqt_4a47MC2DyVb3slZywh4Q	Search Page	1	1
/tv/video/kurt-olson-mike-lindell-and-his-action-plan-and-cyber-symposium-fnale?fbclid=IwAR19b_wCQzOIL5wdCAttJBqp3UI9P6DUUq7N4x3kf85hF9Hv2prU7EnFWE	Search Page	1	1
/tv/video/kurt-olson-mike-lindell-and-his-action-plan-and-cyber-symposium-fnale?fbclid=IwAR1qednKbIM9SqZ9ln4x4mLsMqmXX_HlnuoH9ECUk41ZWmXUo4guqfjHR5w	Search Page	1	1
/403.html?page=/video/put-tsa-security-list-after-attending-mike-lindells-cyber-symposium&from=https://franksp eech.com/user/login?destination=/video/put-tsa-security-list-after-attending-mike-lindells-cyber-symposium	Search Page	1	1
Absolute Proof		32,823	24,540
Scientific Proof		122	50
Absolute Interference		31,834	24,900
Absolute 9-0		642,359	489,552
Cyber Symposium		93,636	70,674
Search Page		676,167	506,756
Clip		547,813	386,477
Live Feed Page		10,269	5,454
Total Traffic		2,035,023	1,508,403
Unique Relevant Videos*			8
Total Video Links			250

*Multiple links direct to the same video. Therefore, an analysis was performed to determine how many unique relevant videos were in the dataset.

Nevium Intellectual Property Consultants
Relief Pay-Per-Click Calculation

Schedule 4a

Pay-Per-Click Analysis - Mike Lindell's Websites				
Search terms	Average PPC	Traffic	Weighted Average PPC	Source
mike lindell	\$0.75	500,000	\$0.22	Document 2a
mypillow guy	\$1.58	5,000	\$0.00	Document 2a
michael lindell	\$0.58	50,000	\$0.02	Document 2a
lindell tv	\$1.33	5,000	\$0.00	Document 2b
frankspeech com	\$2.22	50,000	\$0.06	Document 2c
frankspeech	\$1.13	50,000	\$0.03	Document 2c
mypillow com	\$0.58	50,000	\$0.02	Document 2d
mypillow	\$0.53	500,000	\$0.15	Document 2d
my pillow	\$0.80	500,000	\$0.23	Document 2d
Weighted Average PPC Price - All Sources			\$0.75	
PPC Price			\$0.75	
Video Views Related to the Defamation Campaign			21,819,992	Schedule 3a
Marketing Cost Avoided			\$16,259,722	

Nevium Intellectual Property Consultants

MyPillow Financial Performance*Schedule 5a*

My Pillow, Inc. Profit and Loss Statement					
Source Document	10a	10b	10c	10d	10e
	2018	2019	2020	2021	2022
Ordinary Income/Expense Income	\$280,448,677	\$239,690,771	\$355,680,366	\$531,756,583	\$354,326,075
Cost of Goods Sold	\$112,295,100	\$92,898,527	\$137,308,581	\$259,506,601	\$180,660,075
Gross Profit	\$168,153,577	\$146,792,244	\$218,371,785	\$272,249,982	\$173,666,000
Expense					
COGSAccount	\$32				
5000 · Payroll Expense	\$43,511,551	\$33,277,510	\$33,825,587	\$46,295,714	\$40,195,802
5100 Advertising/Promotional	\$93,084,771	\$82,478,138	\$112,237,346	\$165,240,559	\$111,056,914
5200 · Office Computer Upgrades	\$152,561	\$77,662	\$139,829	\$207,539	\$33,379
6100 · Automobile Expense	\$69,175	\$40,044	\$56,975	\$75,614	\$101,912
6110 · Insurance Expense	\$152,335	\$256,239	\$435,883	\$901,208	\$1,443,641
6120 · Taxes Paid	\$219,396	\$95,520	\$34,697	\$767,272	\$1,006,350
6130 · Professional Fees	\$1,364,841	\$1,343,198	\$6,613,628	\$5,266,441	\$6,850,655
6140 · Occupancy Costs	\$4,386,859	\$4,697,329	\$4,242,306	\$5,063,624	\$5,058,959
6148 · Building Maintenance	\$60,520	\$23,724	\$25,318	\$66,081	\$52,318
6149 · Recycle Expense	\$11,763	\$11,118	\$16,954	\$22,511	(\$12,133)
6150 · Travel & Entertainment	\$1,178,789	\$894,160	\$427,722	\$383,620	\$433,656
6160 · Aircraft Operation Expenses	\$2,543,521	\$2,672,155	\$2,458,598	\$3,428,982	\$4,199,661
6190 · Fees & Discounts	(\$72,715)	\$288	\$887	(\$90)	(\$1,967)
6200 · Charitable Contributions	\$1,608,564	\$1,430,447	\$3,953,821	\$1,469,273	\$978,968
6210 · Political Contributions		\$1,675	\$2,560	\$1,000	
6330 · Office Supplies	\$333,137	\$377,960	\$466,633	\$597,726	\$386,499
6335 · Equipment Rental	\$189,213	\$236,329	\$271,469	\$598,570	\$447,049
6337 · Telecommunications	\$527,082	\$525,721	\$819,831	\$842,977	\$818,134
6340 · Postage and Delivery	\$1,129,504	\$4,764,781	\$737,555	\$2,791,935	\$80,202
6345 · Plant/Office Furniture	\$47,252	\$83,836	\$358,928	\$397,866	\$130,150
6346 · New Building Expenses				\$4,016	\$48,955
6350 · Dues and Subscriptions	\$226,245	\$138,611	\$27,752	\$32,209	\$23,801
6355 · Bank Charges	\$3,655,417	\$3,164,265	\$6,028,222	\$8,677,947	\$6,464,236
6360 · Miscellaneous Expense	\$78,301	\$14,660	\$43,518	\$56,055	\$9,348
6365 Allowance for Bad Debt	\$472,594	\$156,708	\$545,822	\$31,765	(\$8,653)
6400 · Interest Expense	\$75,753	\$191,250	\$80,104	\$12,281	\$1,026,968
6500 · Commissions - QVC	\$123,700	\$119,000			
6550 · Royalties	\$246	\$636	\$85,490	\$86,398	\$257
6560 · Commissions - Misc.	\$2,964,777	\$843,386	\$687,351	\$786,269	\$164,377
6570 · Commissions - Shows	(\$6,482)	\$56,536	\$406	\$7,590	\$4,281
6580 · Commissions - Laughlin	\$60,074	\$46,171	\$8,481		

Nevium Intellectual Property Consultants

MyPillow Financial Performance*Schedule 5a*

My Pillow, Inc. Profit and Loss Statement					
Source Document	10a	10b	10c	10d	10e
	2018	2019	2020	2021	2022
6600 · Sub-Contract Foundation	\$2				
6650 · Materials & Supplies	\$407,121	\$214,157	\$244,388	\$397,450	\$243,914
6690 · "Reconciliation Discrepancies"	(\$304)	\$136			
6700 · Uniforms					\$0
6750 · Research and Development	\$577,000	\$25,000			
6790 · Tools and Equipment	\$27,834	\$11,442	\$71,685	\$94,034	
6800 · Depreciation	\$2,026,049	\$1,587,546	\$1,711,129	\$2,440,800	\$3,272,719
6850 · Foundation Expenses	\$27,923	\$600			
6851 · Lindell Technologies	\$17,265				
6900 · Uncategorized Expenses	\$279				\$0
Total Expense	\$161,231,947	\$139,857,938	\$176,660,876	\$247,045,237	\$184,510,351
Net Ordinary Income	\$6,921,630	\$6,934,306	\$41,710,909	\$25,204,745	(\$10,844,352)
Other Income/Expense	\$405,707	\$92,866	(\$2,062,596)	(\$820,635)	\$11,246,681
Other Expense	\$5,401,782	\$113,434	\$2,549,720	\$45,763	\$1,262,172
Net Other Income	(\$4,996,075)	(\$20,568)	(\$4,612,316)	(\$866,398)	\$9,984,509
Net Income	\$1,925,555	\$6,913,738	\$37,098,593	\$24,338,347	(\$859,843)

Nevium Calculations					
	2018	2019	2020	2021	2022
Revenue	\$280,448,677	\$239,690,771	\$355,680,366	\$531,756,583	\$354,326,075
Advertising and Promotional	\$93,084,771	\$82,478,138	\$112,237,346	\$165,240,559	\$111,056,914
Advertising to Revenue	33.2%	34.4%	31.6%	31.1%	31.3%

MyPillow Advertising Savings					
	2018	2019	2020	2021	2022
Actual Advertising Spend					
Revenue	\$280,448,677	\$239,690,771	\$355,680,366	\$531,756,583	\$354,326,075
Advertising to Revenue	33.2%	34.4%	31.6%	31.1%	31.3%
Advertising Spend				165,240,559	111,056,914
Advertising Spend With Historical Ratios					
Revenue				\$531,756,583	\$354,326,075
Advertising to Revenue: Using 3 year 2018 - 2020 Average				33.1%	33.1%
Advertising Spend Based on Historical Performance				\$175,758,452	\$117,113,364
Advertising Spend Saved				\$10,517,892	\$6,056,450
Total Advertising Savings					\$16,574,343

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Examples of Mentions Indicating Promotion or Purchases of MyPillow Products

Schedule 5b

Examples of Mentions Related to Purchasing MyPillow Products						
Date	Title	Snippet	Url	Page Type	Author	Source Document
7/22/2021	RT @realMaryFanning CYBER SYMPOSIUM \$5,000,000. Challenge @BrianHassine Join the pillow fight to take back America! PromoCode #TAR The American Report https://t.co/GXFaaKisnm	RT @realMaryFanning CYBER SYMPOSIUM \$5,000,000. Challenge @BrianHassine Join the pillow fight to take back America! PromoCode #TAR The American Report https://t.co/GXFaaKisnm	http://twitter.com/SongBird4Trump/statuses/1418320086155333636	twitter	SongBird4Trump	8a
7/30/2021	@justinbaragona @FoxNews? Go to https://t.co/uDsLr6vTYu and support the great patriots, Mike Lindell and his company, by taking advantage of the flash sale leading up to the Cyber Symposium. More info at https://t.co/tm4ra23X1R . Promo codes: Poso, Warroom, Godzilla @JackPosobiec @jfradioshow	@justinbaragona @FoxNews? Go to https://t.co/uDsLr6vTYu and support the great patriots, Mike Lindell and his company, by taking advantage of the flash sale leading up to the Cyber Symposium. More info at https://t.co/tm4ra23X1R . Promo codes: Poso, Warroom, Godzilla @JackPosobiec @jfradioshow	http://twitter.com/76Gargoyle/statuses/1421168871877324800	twitter	76Gargoyle	8a
8/6/2021	Tune in to Mike Lindell's cyber symposium next week! MyPillow CEO is willing to pay 5 MILLION dollars to anyone who can debunk his theory on the 2020 Election. Use promo code RSBN at https://t.co/m6ELgcpdE to show your support for Mike and to save BIGLY! https://t.co/yiloRrPQ7e	Tune in to Mike Lindell's cyber symposium next week! MyPillow CEO is willing to pay 5 MILLION dollars to anyone who can debunk his theory on the 2020 Election. Use promo code RSBN at https://t.co/m6ELgcpdE to show your support for Mike and to save BIGLY! https://t.co/yiloRrPQ7e	http://twitter.com/RSBNNetwork/statuses/1423739678331707397	twitter	RSBNNetwork	8a
8/11/2021	RT @Ridunculous4 While you're taking in the "Cyber Symposium" make sure to take advantage of the MyPillow promo code: warroom #MikeLindellCyberSymposium #Shameless https://t.co/zDesHRPanj	RT @Ridunculous4 While you're taking in the "Cyber Symposium" make sure to take advantage of the MyPillow promo code: warroom #MikeLindellCyberSymposium #Shameless https://t.co/zDesHRPanj	http://twitter.com/feistsheindlin1/statuses/1425532595123720194	twitter	feistsheindlin1	8a
8/14/2021	I commit to buying direct from him any product I need from his store. Mike Lindell's Cyber Symposium https://t.co/wNv6LWxwtw	I commit to buying direct from him any product I need from his store. Mike Lindell's Cyber Symposium https://t.co/wNv6LWxwtw	http://twitter.com/PushBack4Trump/statuses/1426428655971061763	twitter	PushBack4Trump	8a
3/2/2021	@VolumePrintcess @JoeTrades1981 @HopeShild I watched Absolute Proof & buying sheets, pillows, towels from Patriot Mike Lindell Also not shopping @ stores which act like they are located in Marxist countries not a free country like U.S. Call them & tell them we don't ban people bc of their Political affiliation	@VolumePrintcess @JoeTrades1981 @HopeShild I watched Absolute Proof & buying sheets, pillows, towels from Patriot Mike Lindell Also not shopping @ stores which act like they are located in Marxist countries not a free country like U.S. Call them & tell them we don't ban people bc of their Political affiliation	http://twitter.com/novotny_kelly/statuses/1366832998625259523	twitter	novotny_kelly	8b

Nevium Intellectual Property Consultants

Examples of Mentions Indicating Promotion or Purchases of MyPillow Products

Schedule 5b

Examples of Mentions Related to Purchasing MyPillow Products							
Date	Title	Snippet	Url	Page Type	Author	Source Document	
2/23/2021	RT @ggawkward @DarrenMacNeil75 @RealMattCouch Mike Lindell, put out part two of his documentary on "Absolute Proof" on Wednesday! Check it out! Also, support Mike by visiting https://t.co/Gh9cjP8pyA and use promo code TRUMP2020 https://t.co/wK3x9GcgBL	RT @ggawkward @DarrenMacNeil75 @RealMattCouch Mike Lindell, put out part two of his documentary on "Absolute Proof" on Wednesday! Check it out! Also, support Mike by visiting https://t.co/Gh9cjP8pyA and use promo code TRUMP2020 https://t.co/wK3x9GcgBL	http://twitter.com/drormosh/statuses/1364062282200739840	twitter	drormosh	8b	
2/12/2021	Mike Lindell, Brannon Howse And Mary Fanning Present: Absolute Proof: Exposing Election Fraud and The Theft of America by Enemies Foreign and Domestic Worldview Weekend Broadcast Network	Mike Lindell, Brannon Howse And Mary Fanning Present: Absolute Proof: Exposing Election Fraud and The Theft of America by Enemies Foreign and Domestic Please help us with our huge streaming bill to offer this broadcast to you for FREE by supporting us in one of two ways or both by: Going to www.mypillow.com and using the promo code WVW to save up...	https://www.worldviewweekend.com/tv/video/mike-lindell-brannon-howse-and-mary-fanning-present-absolute-proof-exposing-election-fraud	forum		8b	
2/5/2021	LISTEN....UTUBE IS FAR LEFT! You can go on OANN it's there, it's on GAB. It's good! I've watched it twice. Wow I applaud Mike Lindell!!! I'm buying a Matteredress Topper!!! He has spent millions to help us!!!	LISTEN....UTUBE IS FAR LEFT! You can go on OANN it's there, it's on GAB. It's good! I've watched it twice. Wow I applaud Mike Lindell!!! I'm buying a Matteredress Topper!!! He has spent millions to help us!!!	http://twitter.com/SherryPurcell7/statuses/1357771271166132226	twitter	SherryPurcell7	8f	
2/5/2021	Mike Lindell is on OAN, specifically showing the voter fraud in each state. Compelling, true and I'm going to buy me some sheets. This guy is unflappable. Check it out!	Mike Lindell is on OAN, specifically showing the voter fraud in each state. Compelling, true and I'm going to buy me some sheets. This guy is unflappable. Check it out!	https://www.weaselzipper.us/463951-us-air-force-investigating-intruder-at-joint-base-andrews/#comment-5255725959	blog	Ace of Bass	8f	
5/20/2021	This man is a TRUE Patriot. Time to buy some more pillows!!!! "We re Doing FraudPrivate Audits"- Mike Lindell Hired Private Auditors To Uncover Fraud thepalmierireport ^ May 19, 2021 Jacob Palmieri Mike Lindell continues to fight for truth He joined Th...	This man is a TRUE Patriot. Time to buy some more pillows!!!! "We re Doing FraudPrivate Audits"- Mike Lindell Hired Private Auditors To Uncover Fraud thepalmierireport ^ May 19, 2021 Jacob Palmieri Mike Lindell continues to fight for truth He joined The War Room and dropped the bombshell that he has hired private auditors to uncover voter...	http://theeconomiccollapseblog.com/you-might-want-to-check-on-your-investments-because-the-financial-markets-are-starting-to-go-haywire/#comment-5390289751	blog	ISA41:10	8g	
5/12/2021	M Lindell practically giving away his world famous pillows tonight!!	... "... you'll get two free standard pillow! Use promo code war room.	https://greatawakening.win/p/12igTWUcmF/m-lindell-practically-giving-away/c/#530b448015c6c96c04fe880655953e9c#d32fa25fd75f57d7ff9c28e8888574ec	forum	HillaryTrafficsKidz	8g	
2/28/2021	MIKE LINDELL LOST \$65 MILLION because the left is canceling him for supporting President Trump. We need to STAND UP to cancel culture and show them who s boss. PLEASE GO TO MYPILLOW.COM and use code HOPE45 for a massive discount.	I could use another of those pillows, let's go! Where did the \$65 million loss figure come from? I've heard Lindell on War Room, and I think he indicated his sales are doing well in spite of the cancellations. People can buy directly from him.	https://patriots.win/p/12hkTeqSto/mike-lindell-lost-65-million-bec/c/#6ba3323c301cf96b31bc878cebae51b3#d32a98ab6ebf2b76971a5bf619f3016c	forum	Mrsattorney	8g	
2/7/2021		quote: After watching a few of Lindell's interviews and videos, I went and bought a pillow from his site. I don't need a new pillow, but after seeing all the liberal cuck companies that have decided to stop carrying his products I was compelled to go get one. In Yesterday's redemption code according to Lindell on Bannon's War Room, which is...	https://www.tigerdroppings.com/rant/politics/why-does-it-fall-on-private-citizens-to-investigate-corruption/94985497/#o94987217#daa3e88dc1bd1e71bacab4dbb6e666c0	forum	theroarrestoredinbr	8g	
2/1/2023	Who s watching Mike Lindell on Jimmy Kimmel tonight? In honor of First Class Father @realMikeLindell joining @jimmykimmel take advantage of #MyPillow 2.0 BUY 1 GET 1 FREE Visit My Pillow Use Fatherhood https://t.co/UxzWKNFKCZ	Who s watching Mike Lindell on Jimmy Kimmel tonight? In honor of First Class Father @realMikeLindell joining @jimmykimmel take advantage of #MyPillow 2.0 BUY 1 GET 1 FREE Visit My Pillow Use Promo Code: Fatherhood https://t.co/UxzWKNFKCZ	http://twitter.com/AlecLace/statuses/1620652677360410627	twitter	AlecLace	8n	

Analysis of MyPillow Product Categories

Schedule 6a

[illegible]

Notes:

- 1) Mattresses first appeared as a category on the website in February 2021, but a review of the website determined that mattresses had previously been sold. Therefore, Mattresses were not a new product in February 2021.
- 2) Clothing first appeared as a category on the website in November 2021, but a review of the website determined that clothing had previously been sold. Therefore, Clothing was not a new product in November 2021.
- 3) A review of the website determined that Dog Beds were sold in these time periods, but were removed as a category from February 2021 to October 2021.
- 4) The TV Specials category does not sell new products, it includes additional discounts for existing products.
- 5) The Roll&Go; Book Offer does not contain any new products, it includes additional discounts for existing products. It was made into a category only for the month of October 2021.
- 6) It appears MySlippers was first introduced around March 2021 and is a product that had not been previously sold.
- 7) The Other Products category is a catch-all that includes dog beds, slippers, pillows, sheets, mattresses, blankets, and others.

Documents Considered

Pleadings

4/7/2023 First Supplemental Complaint and Exhibits

Discovery Responses

12/5/2022 Plaintiffs' Answers and Objections to Defendant My Pillow, Inc.'s First Set of Interrogatories

12/14/2022 Plaintiffs' Answers and Objections to Defendant My Pillow, Inc.'s Second Set of Interrogatories

2/15/2023 Plaintiffs' Supplemental Answers and Objections to Defendant My Pillow, Inc.'s First Set of Interrogatories

4/28/2023 Plaintiff's Second Supplemental Answers and Objections to Defendant My Pillow, Inc.'s First Set of Interrogatories

4/28/2023 Plaintiff's Supplemental Answers and Objections to Defendant My Pillow, Inc.'s Second Set of Interrogatories

6/14/2023 Plaintiffs' Third Supplemental Answers and Objections to Defendant My Pillow, Inc.'s First Set of Interrogatories

6/19/2023 Plaintiffs' Answers and Objections to Defendant My Pillow, Inc.'s Third Set of Interrogatories

7/21/2023 Plaintiffs' Third Supplemental Answers and Objections to Defendant My Pillow, Inc.'s First Set of Interrogatories

9/1/2023 Plaintiffs' Answers and Objections to Defendants' Fourth Set of Interrogatories

12/5/2022 Defendant Michael J. Lindell's Answers and Objections to Plaintiff's First Set of Interrogatories

12/5/2022 Defendant My Pillow, Inc.'s Answers and Objections to Plaintiff's First Set of Interrogatories

12/5/2022 Defendant My Pillow, Inc.'s Answers and Objections to Plaintiff's Second Set of Interrogatories

1/11/2023 Defendant Michael J. Lindell's Supplemental Answers and Objections to Plaintiff's First Set of Interrogatories

Documents Considered

Discovery Responses cont.

1/11/2023 Defendant My Pillow Inc.'s Supplemental Answers and Objections to Plaintiff's First Set of Interrogatories

1/11/2023 Defendant My Pillow Inc.'s Supplemental Answers and Objections to Plaintiff's Second Set of Interrogatories

4/7/2023 Defendant My Pillow Inc.'s Second Supplemental Answer to Plaintiff's Interrogatory No. 6

4/28/2023 Defendants' Answers and Objections to Plaintiffs' Third Set of Interrogatories

5/19/2023 Defendants' Supplemental Answers and Objections to Plaintiffs' Third Set of Interrogatories

6/16/2023 Defendant My Pillow's Second Supplemental Answer to Plaintiffs' Interrogatory No. 21 – verification page

8/4/2023 Defendant Michael J. Lindell's Second Supplemental Answers and Objections to Plaintiff's First Set of Interrogatories

9/1/2023 Defendant Michael Lindell's Third Supplemental Answers and Objections to Plaintiff's First Set of Interrogatories

9/1/2023 Defendant My Pillow, Inc.'s Third Supplemental Answers and Objections to Plaintiff's First Set of Interrogatories

9/1/2023 Defendant My Pillow, Inc.'s Third Supplemental Answers and Objections to Plaintiff's Second Set of Interrogatories

Depositions

Jessica Maskovich 7/14/2023 and Exhibits

Dawn Curtis 9/12/2023 and Exhibits

Sarah Cronin 7/13/2023 and Exhibits

Todd Carter 8/24/2023 and Exhibits

Produced Documents

COOMER- SMT-LINDELL 000070 – COOMER – SMT – LINDELL 000152

COOMER -SMT-Lindell 000156 - COOMER-SMT-LINDELL 000249

COOMER -SMT-Lindell 000253 - COOMER -SMT- Lindell 000260

DEF030738

DEF030739

Documents Considered

Produced Documents cont.

DEF030740
DEF030741
DEF030742
DEF030743
DEF030744
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DEF030746
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